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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE  
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*Epic Games, Inc. v. Google LLC et al.*,  
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.*,  
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF CHRISTIAN  
CRAMER IN SUPPORT OF OMNIBUS  
MOTION TO SEAL MATERIALS  
SUBMITTED IN CONNECTION WITH  
THE SUMMARY JUDGMENT AND  
DAUBERT BRIEFING**

Judge: Hon. James Donato

1 I, Christian Cramer, declare as follows:

2 1. I am currently a Finance Director for Defendant Google LLC (along with Google-  
3 affiliated entities, “Google”). I have been employed by Google since September 2007 and have held  
4 my current position since March 2017. Over the course of my employment at Google, I have acquired  
5 personal knowledge of Google’s practices and procedures concerning the maintenance of the  
6 confidentiality of its strategic, business, and marketing information.

7 2. I submit this declaration in support of the Omnibus Motion to Seal Materials Submitted  
8 in Connection with The Summary Judgment and Daubert Briefing, filed on July 13, 2023 in *In re*  
9 *Google Play Store Antitrust Litigation*, Case No. 3:21-md-02981-JD; *Epic Games, Inc. v. Google LLC*,  
10 Case No. 3:20-cv-05671-JD; *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-  
11 05761-JD; *Match Group, LLC et al. v. Google LLC et al.*, Case No. 3:22-cv-02746-JD, and *State of*  
12 *Utah v. Google LLC*, Case No. 3:21-cv-05227-JD.

13 3. The facts set forth in this declaration are true and correct to the best of my knowledge,  
14 information, and belief, and are based on my personal knowledge of Google’s policies and practices as  
15 they relate to the treatment of confidential information, the materials that were provided to me and  
16 reviewed by me, and/or conversations with other knowledgeable employees of Google. If called upon  
17 as a witness in this action, I could and would testify from my personal knowledge and knowledge  
18 acquired from sources with factual foundation.

19 **The Material to Be Sealed Is Highly Confidential Because It Reflects Non-Public Commercial**  
20 **Agreements and Contract Proposals, and Because It Reveals Google’s Competitive Decision-**  
**Making and Business Strategy**

21 4. As demonstrated with factual particularity below, all the material for which Google  
22 requests sealing is maintained as highly confidential. To the best of my knowledge, none of this  
23 material has been publicly disclosed.

24 5. As a matter of routine practice and internal policy, Google and its employees strictly  
25 treat as confidential, inter alia, (i) internal, non-public financial information; (ii) non-public  
26 commercial proposals to third parties; (iii) non-public agreements with third parties; (iv) internal  
27 surveys and analyses of customer preferences, spending, revenue, market conditions, business strategy,  
28

1 competitive dynamics, and commercial opportunities; (v) non-public financial forecasts and business  
2 plans; (vi) trade secrets; and (vii) other sensitive material that, if publicly disclosed, could potentially  
3 enable Google's competitors to undermine Google's competitive position in the marketplace, allow  
4 current or prospective business partners or counterparties to take unfair advantage of Google in  
5 negotiations or other business affairs, violate Google's confidentiality obligations to third parties, or  
6 otherwise prejudice Google's business interests. In my experience and to the best of my knowledge,  
7 Google does not disclose internal documents, data, or information of this nature outside of the  
8 company, except to authorized third parties when so required or permitted by law or contract. To that  
9 end and in order to prevent inadvertent revelation of this information to the public, Google has several  
10 policies in place like prohibiting employees from accessing information beyond what is reasonably  
11 necessary to perform their duties, limiting access to certain internal systems, permitting access to  
12 document databases on a need-to-know basis, and requiring the use of an encrypted email system. I  
13 am also aware that, generally, Google employees are required to sign a confidentiality agreement  
14 requiring each employee to keep information confidential and shared only within the company.

15 6. Third parties—including Google's customers, suppliers, business partners, and others  
16 who interact or transact with Google in an array of contexts—entrust highly sensitive, non-public, and  
17 confidential information to Google every day. These third parties have an expectation that Google can  
18 and will protect the confidentiality of that information. In many cases, Google is contractually bound  
19 to keep that information confidential. In my experience and to the best of my knowledge, Google does  
20 not disclose internal documents, data, or information reflecting third parties' confidential information  
21 outside of the company, unless and only to the extent it has been authorized (or is lawfully permitted or  
22 required) to do so. Rather, as noted above, Google policies and protocols are designed to ensure the  
23 confidentiality of third-party material is strictly maintained.

24 **There is Good Cause and Compelling Reasons to Seal Google's Highly Confidential Material**

25 7. As demonstrated with factual particularity below, there is "good cause" to seal Google's  
26 confidential materials. But even if Google were required to demonstrate "compelling reasons" for  
27 sealing, the materials for which Google requests sealing would still satisfy that standard. The public  
28

disclosure of Google's internal, confidential material (including material that reflects third parties' confidential information) could, among other things, harm Google's business and customer relationships, undermine Google's ability to retain and attract customers and business partners who entrust Google with their confidential information, jeopardize Google's ability to conduct business with current and prospective business partners, enable Google's competitors to undermine Google's competitive position in the marketplace, allow current or prospective business partners or counterparties to take unfair advantage of Google in negotiations or other business affairs, or otherwise prejudice Google's and/or third parties' business interests. These materials therefore derive economic value from not being generally known to Google's competitors, counterparties, or the public. The release of this information to the public will cause tangible commercial injury to Google and to those who provided their confidential information to Google with the expectation that confidences would be maintained.

8. I understand that the Omnibus Motion to Seal Materials Submitted in Connection with The Summary Judgment and Daubert Briefing requests that the Court maintain the specific information identified below under seal. For the reasons stated below, this information is confidential and highly sensitive, and if publicly disclosed, could significantly prejudice Google's competitive position by harming Google's relationship with business partners, putting Google at unfair disadvantage in future business negotiations, and permitting Google's competitors to gain unfair advantage in competition with Google.

9. Given the volume of underlying documents subject to the Omnibus Motion to Seal Materials Submitted in Connection with The Summary Judgment and Daubert Briefing, the below table identifies the relevant paragraphs from my declaration that support Google's specific sealing requests for each underlying document:

Document	Declaration Paragraphs	Exhibits to N. Pfeiffer Declaration
Match Plaintiffs' Motion for Partial Summary Judgment and all relevant exhibits [Dkt. No. 486]	¶¶ 10-161	Exhibits A1 to A18

Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment and all relevant exhibits [Dkt. No. 506]	¶¶162-224	Exhibits B1 to B11
Google's Motion for Partial Summary Judgment and all relevant exhibits [Dkt. No. 480]	¶¶225-237	Exhibits C1 to C3
Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment and all relevant exhibits [Dkt. No. 509]	¶¶238-458	Exhibits D1 to D17
Google's Motion to Exclude Opinions Offered by Hal Singer and all relevant exhibits [Dkt. No. 487]	¶¶459-1000	Exhibits E1 to E6
Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Hal Singer and all relevant exhibits [Dkt. No. 508]	¶¶1001-1048	Exhibits F1 to F5
Google's Reply In Support Of Motion to Exclude Opinions Offered by Hal Singer [Dkt. No. 524]	¶¶1049-1051	Exhibit G1
Google's Motion to Exclude Opinions Offered by Marc Rysman and all relevant exhibits [Dkt. No. 484]	¶¶1052-1341	Exhibits H1 to H2
Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Marc Rysman and all relevant exhibits [Dkt. No. 512]	¶¶1342	Exhibits I1

**Specific Information to Be Sealed**

**Declaration of Joseph A. Reiter in Support of The Match Plaintiffs' Motion for Partial Summary Judgment [Dkt 486-1]**

**(Exhibit A1)**

10. **Page 10, Paragraph 8 (app developers listed in figure).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of

1 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
2 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
3 decision-making, which, for example, could give a competitor or potential business partner unfair  
4 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
5 this non-party information to unfairly target Google's developer partners.

6       **11. Page 11, Paragraph 8 (app developers listed in figure).** This text contains  
7 confidential, non-public information regarding non-party developers, and implicates the non-party's  
8 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
9 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
10 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
11 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
12 decision-making, which, for example, could give a competitor or potential business partner unfair  
13 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
14 this non-party information to unfairly target Google's developer partners.

15       **12. Page 12, Paragraph 9 (app developers listed in figure).** This text contains  
16 confidential, non-public information regarding non-party developers, and implicates the non-party's  
17 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
18 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
19 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
20 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
21 decision-making, which, for example, could give a competitor or potential business partner unfair  
22 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
23 this non-party information to unfairly target Google's developer partners.

24       **13. Page 13, Paragraph 10 (app developers listed in figure).** This text contains  
25 confidential, non-public information regarding non-party developers, and implicates the non-party's  
26 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
27 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
28

contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

14. **Page 13, Paragraph 10 (after "Estimate Financial Gain" to end of sentence").** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

15. **Page 13, Paragraph 11 (between "like Match" and "began as a web business").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

16. **Page 25, Paragraph 25 (between "(as at 5/25):" and "of apps"; between "of apps" and "total) that requested"; between "3/31; of which" and "of app updates"; all figures in rows named "Managed" and "Ecosystem & Unmanaged" and "Total").** This information contains non-public and confidential data regarding internal user, transaction, or app performance data on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as



1 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 2 making and business strategies employed by Google’s app store competitors, for example by  
 3 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 4 themselves from Google Play in the eyes of U.S. developers.

5 17. **Page 28, Paragraph 29 (between “hurt user experience and revenue.” and “And**  
 6 **with this additional tax”).** This information contains non-public and confidential data regarding in-  
 7 development and unreleased features on Google Play. This information has never been disclosed  
 8 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 9 information could influence the competitive decision-making and business strategies employed by  
 10 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 11 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

12 **Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 6 [Dkt 486-7]**  
 13 **(Exhibit A2)**

14 18. **Exhibit 6, Page -940 (app developer names and logos following “Match” in the**  
 15 **slide).** The disclosure of developers' highly confidential information would significantly harm  
 16 developers' business. For example, developers' competitors could leverage this information to reap an  
 17 unearned competitive advantage. They could exploit this information—that they otherwise would not  
 18 have access to—to inform their own business strategies. To prevent these competitive harms from  
 19 coming to fruition, developers proactively maintain the confidentiality of their strategic information,  
 20 only disclosing it to a select group of individuals on an as-needed basis.

21 19. **Exhibit 6, Page -941 (app developer logos between “Tinder” and “Epic Games”;**  
 22 **app developer name and logo following “Epic Games”; between “avoid 30% cut The Verge July**  
 23 **2019” and “Epic trying to launch”; between “Play Billing integration” and end of slide).** This text  
 24 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 25 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 26 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 27 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 28



of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners. Additionally, the disclosure of developers’ highly confidential information would significantly harm developers’ business. For example, developers’ competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis.

20. **Exhibit 6, Page -945 (app developer logos before and following “Match” in the slide).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

21. **Exhibit 6, Page -948 (between “20 UAC partners” and “of tot UAC”; all figures in columns named “Parent Name” and “2019 UAC Spend” and “% of Total 2019 UAC”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic

1 decision-making, which, for example, could give a competitor or potential business partner unfair  
 2 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 3 this non-party information to unfairly target Google's developer partners.

4 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 7 [Dkt 486-8]**  
 5 **(Exhibit A3)**

6 22. **Exhibit 7, Page -994 (app developer names and logos except "Epic Games" and**  
 7 **"Tinder" and "Match").** This text contains confidential, non-public information regarding non-party  
 8 developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google  
 9 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
 10 will maintain the confidentiality of contractual terms and its own confidential statements made during  
 11 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 12 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 13 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 14 Google's competitors could use this non-party information to unfairly target Google's developer  
 15 partners.

16 23. **Exhibit 7, Page -996 (between "How This Plays Out" and "all functions to drive";**  
 17 **between "trust the forefront" and "Unlock GPB integration"; between "need to be ready "Day**  
 18 **1" and end of slide).** This text contains non-public and confidential information regarding payment  
 19 policy and related strategy on Google Play. If publicly revealed, this information could cause Google  
 20 competitive harm by giving other parties insight into Google's strategic considerations and thus a  
 21 competitive advantage over Google in ongoing or future business negotiations.

22 24. **Exhibit 7, Page -997 (between "Play Payments Policy - Assumptions" and "Impact**  
 23 **will be").** This text contains non-public and confidential information regarding Google Play's  
 24 payment policy and internal strategy regarding the same. If publicly revealed, this information could  
 25 cause Google competitive harm by giving other parties insight into Google's strategic considerations  
 26 and thus a competitive advantage over Google in ongoing or future business negotiations.

1           25.     **Exhibit 7, Page -998 (between beginning of column and “YT/1P”; between “FOP**  
 2 **Gap remediation Program” and end of column; entire chart below months).** This text contains  
 3 non-public and confidential information regarding Google Play’s payment policy and internal strategy  
 4 regarding the same, including with respect to specific developers and types of developers. If publicly  
 5 revealed, this information could cause Google competitive harm by giving other parties insight into  
 6 Google's strategic considerations and thus a competitive advantage over Google in ongoing or future  
 7 business negotiations.

8           26.     **Exhibit 7, Page -999 (between “Risks & Assumptions” and “and YT are”; between**  
 9 **“accommodations. Mitigation:” and “COVID-19 landscape is”; between “unpredictable.**  
 10 **Mitigation:” and “Mitigation:”; between “Mitigation:” and end of slide).** This text contains non-  
 11 public and confidential information regarding risks, priorities, and strategy relating to Google Play’s  
 12 payment policy, including with respect to a specific developer. If publicly revealed, this information  
 13 could cause Google competitive harm by giving other parties insight into Google's strategic  
 14 considerations and thus a competitive advantage over Google in ongoing or future business  
 15 negotiations.

16           27.     **Exhibit 7, Page -000 (between “Key Developers (LRAP++ etc)” and “Nest”;**  
 17 **between “Nest” and “YT”; between “follow-up on Priority” and “Pfeng: Flag in”; between**  
 18 **“townhall for Policy” and “Investigate the enforcement”).** This text contains non-public and  
 19 confidential information regarding Google’s agreements with non-party developers as well as internal  
 20 strategy relating to Google Play’s payment policy. Disclosure of this non-public information is likely  
 21 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
 22 could give a competitor or potential business partner unfair leverage in competing against or  
 23 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 24 unfairly target Google's developer partners and offer specific deal terms designed to undercut those  
 25 offered by Google.

26           28.     **Exhibit 7, Page -002 (entire chart in slide).** This text contains information regarding  
 27 confidential internal strategy regarding Google Play’s payment policy and implementation. If publicly  
 28

revealed, this information could cause Google competitive harm by giving other parties insight into Google's strategic considerations and thus a competitive advantage over Google in ongoing or future business negotiations.

29. **Exhibit 7, Page -004 (between “PRDs for console are there” and “Subs variants sequencing”).** This text contains information regarding confidential internal strategy regarding Google Play’s payment policy and implementation, including headcount and organizational considerations. If publicly revealed, this information could cause Google competitive harm by giving other parties insight into Google's strategic considerations and priorities and thus a competitive advantage over Google in ongoing or future business negotiations.

30. **Exhibit 7, Page -005 (between “We will keep current investment in” and “We will be thoughtful in our approach”).** This text contains information regarding confidential internal strategy regarding Google Play’s payment policy and planned future investments relating to the same. If publicly revealed, this information could cause Google competitive harm by giving other parties insight into Google's financial and strategic considerations, priorities, and future outlook of the Play business, which arguably gives Google's competitors an unfair advantage.

31. **Exhibit 7, Page -007 (entire slide except slide header and column headers).** This text contains information regarding confidential internal strategy regarding Google Play’s payment policy and planned future investments relating to the same, including funding sources and including with respect to specific non-party developers. If publicly revealed, this information could cause Google competitive harm by giving other parties insight into Google's financial and strategic considerations, priorities, and future outlook of the Play business, which arguably gives Google's competitors an unfair advantage.

32. **Exhibit 7, Page -010 (between beginning of column and “LRAP++”; between “LRAP++” and “YT/P”; between “FOP Gap remediation Program” and end of column; entire chart below months).** This text contains information regarding confidential internal strategy regarding Google Play’s payment policy and timing of implementation relating to the same, including with respect to specific non-party developers. If publicly revealed, this information could cause Google

1 competitive harm by giving other parties insight into Google's strategic considerations and priorities,  
2 which arguably gives Google's competitors an unfair advantage. Moreover, Google's competitors  
3 could use this non-party information to unfairly target Google's developer partners.

4       **33. Exhibit 7, Page -013 (between "Why:" and "will also require similar flexibility";**  
5 **between "When:" and "This needs to be built in Q3").** This text contains confidential, non-public  
6 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
7 revealing the identity of Google business partners who are not party to this litigation, and who have a  
8 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
9 confidential statements made during negotiations. Further, disclosure of this non-public information is  
10 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
11 example, could give a competitor or potential business partner unfair leverage in competing against or  
12 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
13 unfairly target Google's developer partners.

14       **34. Exhibit 7, Page -015 (between beginning of sentence and "-Policy").** This text  
15 contains confidential, non-public information regarding a non-party developer, and implicates the non-  
16 party's confidentiality interests, by revealing the identity of a Google business partner who is not a  
17 party to this litigation, and who has a reasonable expectation that Google will maintain the  
18 confidentiality of contractual terms and its own confidential statements made during negotiations.

19       **35. Exhibit 7, Page -016 (between "Device delegation" and "Wear - Free Acquisition").**  
20 This text contains confidential, non-public information regarding a non-party developer, and implicates  
21 the non-party's confidentiality interests, by revealing the identity of a Google business partner who is  
22 not a party to this litigation, and who has a reasonable expectation that Google will maintain the  
23 confidentiality of contractual terms and its own confidential statements made during negotiations.  
24 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
25 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
26 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
27 competitors could use this non-party information to unfairly target Google's developer partners.

36. **Exhibit 7, Page -018 (between beginning of sentence and “What are we building?”).** This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party’s confidentiality interests, by revealing the identity of a Google business partner who is not a party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

37. **Exhibit 7, Page -019 (between “Principles” and “-Light the Path”; between “Get out house in order” and “Re examine FOP”; between “sprints not a marathon” and “Leads “Office hours” for”; between “for fast decision making.” and end of sentence).** This text contains information regarding confidential internal strategy and priorities regarding Google Play’s payment policy and planned implementation of the same. If publicly revealed, this information could cause Google competitive harm by giving other parties insight into Google's financial and strategic considerations, priorities, and future outlook of the Play business, which arguably gives Google's competitors an unfair advantage.

38. **Exhibit 7, Page -020 (between “Step2:” and “Enable Accelerators, LRAP ++”; between “1P resolved” and “landed (or close)”; between “Assumptions” and “Eng work could run”).** This text contains information regarding confidential internal strategy and priorities regarding Google Play’s payment policy and planned implementation of the same. If publicly revealed, this information could cause Google competitive harm by giving other parties insight into Google's financial and strategic considerations, priorities, and future outlook of the Play business, which arguably gives Google's competitors an unfair advantage.

**Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 13 [Dkt 486-14]  
(Exhibit A4)**

39. **Exhibit 13, Page -914 (between “\_Assigned to Danielle Martinak\_” and “https://docs.google.com/spreadsheets/d/1et-” ; between “com.match.android.matchmobile gets it to 96%” and “Commented [5]:Yes! Thanks” ).** This information contains non-public and confidential data regarding internal discussions and potential responses to Match proposals regarding

Google Play policies. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

40. **Exhibit 13, Page -915 (all figures in rows named "CURRENT" and "ORIGINAL" in chart).** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google. This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

41. **Exhibit 13, Page -917 (between "across the Match portfolio by" and end of sentence).** This information contains non-public and confidential data regarding internal discussions and potential responses to Match proposals regarding Google Play policies. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

**Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 16 [Dkt 486-17]**



(Exhibit A5)

42. **Exhibit 16, Page -354 (between “back to exclusive GPB” and end of sentence).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google. This information also contains non-public and confidential data regarding developer outreach and incentives on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

43. **Exhibit 16, Page -355 (between “platform (similar to” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

44. **Exhibit 16, Page -357 (between “Tinder’s decision-making:” and “Note that the model does”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to

mimic its confidential strategies in an effort to attract developers away from Google. This information also contains non-public and confidential data regarding developer outreach and incentives on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

**Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 20 [Dkt 486-21]**  
**(Exhibit A6)**

45. **Exhibit 20, GOOG-PLAY-001165245, Paragraph 4 (between “better for the ecosystem” and end of sentence).** The disclosure of the developer's highly confidential information would significantly harm the developer's business. For example, the developer's competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the developer proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

46. **Exhibit 20, GOOG-PLAY-001165246, Paragraph 3 (between “plan to discuss” and “in the same discussion”).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

47. **Exhibit 20, GOOG-PLAY-001165246, Bullet Point 4 (between “standard terms for” and end of sentence).** This text contains confidential, non-public information regarding Google's

1 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
 2 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
 3 competitor or potential business partner unfair leverage in competing against or negotiating with  
 4 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 5 Google's developer partners and offer specific deal terms designed to undercut those offered by  
 6 Google. Further, the disclosure of developers' highly confidential information would significantly harm  
 7 developers' business. For example, developers' competitors could leverage this information to reap an  
 8 unearned competitive advantage. They could exploit this information—that they otherwise would not  
 9 have access to—to inform their own business strategies. To prevent these competitive harms from  
 10 coming to fruition, developers proactively maintain the confidentiality of their strategic information,  
 11 only disclosing it to a select group of individuals on an as-needed basis.

12 48. **Exhibit 20, GOOG-PLAY-001165247, Bullet Point 1 (between “would move them”**  
 13 **and “recommendation is Jamie”).** The disclosure of the developer's highly confidential information  
 14 would significantly harm the developer's business. For example, the developer's competitors could  
 15 leverage this information to reap an unearned competitive advantage. They could exploit this  
 16 information—that they otherwise would not have access to—to inform their own business strategies.  
 17 To prevent these competitive harms from coming to fruition, the developer proactively maintains the  
 18 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
 19 needed basis.

20 49. **Exhibit 20, GOOG-PLAY-001165247, Bullet Point 2 (between “Messaging” and “-**  
 21 **we value”; between “with them on” and “deal”; between “get us to” and “additional product”).**  
 22 This text contains confidential, non-public information regarding Google's agreements with non-party  
 23 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
 24 as it reveals strategic decision-making which, for example, could give a competitor or potential  
 25 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 26 competitors could use this non-party information to unfairly target Google's developer partners and  
 27 offer specific deal terms designed to undercut those offered by Google.

1           50.     **Exhibit 20, GOOG-PLAY-001165247, Bullet Point 3 (between “via the app hence”**  
 2 **and “We”; between “consumption-only” and “Similar approach”).** This text contains confidential,  
 3 non-public information regarding Google’s agreements with non-party developers. Disclosure of this  
 4 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 5 decision-making which, for example, could give a competitor or potential business partner unfair  
 6 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 7 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
 8 designed to undercut those offered by Google. Additionally, the disclosure of the developer's highly  
 9 confidential information would significantly harm the developer's business. For example, the  
 10 developer's competitors could leverage this information to reap an unearned competitive advantage.  
 11 They could exploit this information—that they otherwise would not have access to—to inform their  
 12 own business strategies. To prevent these competitive harms from coming to fruition, the developer  
 13 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
 14 of individuals on an as-needed basis.

15           51.     **Exhibit 20, GOOG-PLAY-001165247, Bullet Point 6 (start of sentence and “we are**  
 16 **prepared”; between “to offer” and “NOTE”; between “exec approvals?” and “(details)”;**  
 17 **between “new tier?” and “Available to”; between “devs with” and “Requires”).** This text contains  
 18 confidential, non-public information regarding Google’s agreements with non-party developers.  
 19 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
 20 strategic decision-making which, for example, could give a competitor or potential business partner  
 21 unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors  
 22 could use this non-party information to unfairly target Google's developer partners and offer specific  
 23 deal terms designed to undercut those offered by Google. Additionally, the disclosure of developers'  
 24 highly confidential information would significantly harm developers' business. For example,  
 25 developers' competitors could leverage this information to reap an unearned competitive advantage.  
 26 They could exploit this information—that they otherwise would not have access to—to inform their  
 27 own business strategies. To prevent these competitive harms from coming to fruition, developers  
 28

1 proactively maintain the confidentiality of their strategic information, only disclosing it to a select  
2 group of individuals on an as-needed basis.

3 52. **Exhibit 20, GOOG-PLAY-001165247, Line 1. (start of sentence and “If”; between**  
4 **“If” and “is approved for”; between “proposal to” and “soon (asap)”; between “allocation issue**  
5 **for” and “so if we”; between “ahead with” and “let’s offer”; between “For” and “this gives us”).**  
6 The disclosure of the developer's highly confidential information would significantly harm the  
7 developer's business. For example, the developer's competitors could leverage this information to reap  
8 an unearned competitive advantage. They could exploit this information—that they otherwise would  
9 not have access to—to inform their own business strategies. To prevent these competitive harms from  
10 coming to fruition, the developer proactively maintains the confidentiality of its strategic information,  
11 only disclosing it to a select group of individuals on an as-needed basis.

12 53. **Exhibit 20, GOOG-PLAY-001165248, Paragraph 1 (between “With” and “how do**  
13 **we deal”).** The disclosure of developers' highly confidential information would significantly harm  
14 developers' business. For example, developers' competitors could leverage this information to reap an  
15 unearned competitive advantage. They could exploit this information—that they otherwise would not  
16 have access to—to inform their own business strategies. To prevent these competitive harms from  
17 coming to fruition, developers proactively maintain the confidentiality of their strategic information,  
18 only disclosing it to a select group of individuals on an as-needed basis.

19 54. **Exhibit 20, GOOG-PLAY-001165248, Paragraph 2 (between “KR> Yes” and**  
20 **“may keep”; between “may keep” and “engaged”; between “to go to” and “to qualify for”;**  
21 **between “to qualify for” and end of sentence”).** This text contains confidential, non-public  
22 information regarding Google’s agreements with non-party developers. Disclosure of this non-public  
23 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
24 which, for example, could give a competitor or potential business partner unfair leverage in competing  
25 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
26 information to unfairly target Google's developer partners and offer specific deal terms designed to  
27 undercut those offered by Google. Additionally, the disclosure of developers' highly confidential  
28



Google as, for example, Google's competitors could use this information to unfairly target Google's developer partners and offer deal terms specifically designed to undercut those offered by Google.

58. **Exhibit 22, GOOG-PLAY-011456522, 6/25 Weekly Progress (between “FR status to Match below” and “Redacted – Privilege”; between “Redacted – Privilege” and “Payment methods”; between “Payment methods” and “Add-ons/ flexible offers”).** This text contains non-public and confidential information regarding negotiations with a developer on Google Play, including confidential product feature requests by this developer. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

59. **Exhibit 22, GOOG-PLAY-011456523, 6117 - Questions from Peter (between “(Sent to Match on 5/21~)” and “Redacted – Privilege”; between “Redacted – Privilege” and “Payment methods”; between “Payment methods” and “Add-ons/ flexible offers”).** This text contains non-public and confidential information regarding negotiations with a developer on Google Play, including confidential product feature requests by this developer and the technical development status of the same. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

60. **Exhibit 22, GOOG-PLAY-011456523, 6/16 - Don / Gary Debrief (between “No allusions to senate” and “Part 2”).** This text contains confidential, non-public information regarding Google’s agreements and related negotiations with a specific developer. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party



1 information to unfairly target Google's developer partners and offer specific deal terms designed to  
2 undercut those offered by Google.

3       61.     **Exhibit 22, GOOG-PLAY-011456524, Part 2 (between “wasn't worth doing” and**  
4 **“Product”)**. This text contains confidential, non-public information regarding Google’s agreements  
5 and related negotiations with a specific developer. Disclosure of this non-public information is likely  
6 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
7 could give a competitor or potential business partner unfair leverage in competing against or  
8 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
9 in negotiations with Google to gain an unfair advantage against Google.

10       62.     **Exhibit 22, GOOG-PLAY-011456524, 5/26/21 (between “What Gary hopes to get**  
11 **out of the meeting?” and “Redacted – Privilege”)**. This text contains confidential, non-public  
12 information regarding Google’s agreements and related negotiations with a specific developer.  
13 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
14 strategic decision-making which, for example, could give a competitor or potential business partner  
15 unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors  
16 could use this non-party information to unfairly target Google's developer partners and offer specific  
17 deal terms designed to undercut those offered by Google.

18       63.     **Exhibit 22, GOOG-PLAY-011456524, Commented [10] (between “to be wrapped**  
19 **up” and “but worth noting”)**. This text contains confidential, non-public information regarding  
20 Google’s agreements and related negotiations with a specific developer, including specific confidential  
21 deal terms considered by Google. Disclosure of this non-public information is likely to result in  
22 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
23 competitor or potential business partner unfair leverage in competing against or negotiating with  
24 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
25 Google's developer partners and offer specific deal terms designed to undercut those offered by  
26 Google.

64. **Exhibit 22, GOOG-PLAY-011456525, 5/21/21 (between “Closing out issues” and “Penalty for missing”; between “Remove grace period” and “The date for phase 2”).** This text contains confidential, non-public information regarding Google’s agreements and related negotiations with a specific developer. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. If revealed, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

65. **Exhibit 22, GOOG-PLAY-011456525, 5/19/21 (between “Communicate spirit” and “Is it just GPB”).** This text contains confidential, non-public information regarding Google’s agreements and related negotiations with a specific developer. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

66. **Exhibit 22, GOOG-PLAY-011456526, 5/13/21 - SPDR (between “Make sure we get” and “Start with asking why”; between “Start with asking why” and “Billing Timelines”; between “AVP developers i.e.” and “No surprises”; between “proration as leverage” and “In principle in favor”; between “at AVP level” and “Right exec mapping”).** This text contains confidential, non-public information regarding Google’s agreements and related negotiations with a specific developer, including specific confidential deal terms considered by Google. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. If revealed, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

67. **Exhibit 22, GOOG-PLAY-011456527, 5/3 - Contract Walkthrough (between “of policy change” and “It’s not a state”).** This text contains confidential, non-public information regarding Google’s agreements and related negotiations with a specific developer, including specific confidential deal terms considered by Google. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

68. **Exhibit 22, GOOG-PLAY-011456529, 4/13 - DMF Contract Review (between “will we hit” and “Unknowable”).** This text contains confidential, non-public information purporting to reveal a developer’s statements made during negotiations with Google, including in relation to that developer’s consumer spend on Google Play. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

69. **Exhibit 22, GOOG-PLAY-011456530, 4/13 - DMF Contract Review (between “submissions and allocation” and “- will be very different”).** This text contains confidential, non-public information purporting to reveal a developer’s statements made during negotiations with Google, including confidential financial deal terms. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

70. **Exhibit 22, GOOG-PLAY-011456531, 3/30 - Match AVP Feedback w/ Legal (between “Term & Termination” and “Product Requirements”).** This text contains confidential,

1 non-public information purporting to reveal a developer's statements made during negotiations with  
 2 Google, including with respect to confidential deal terms. Disclosure of this non-public information is  
 3 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 4 example, could give a competitor or potential business partner unfair leverage in competing against or  
 5 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
 6 in negotiations with Google to gain an unfair advantage against Google.

7       **71. Exhibit 22, GOOG-PLAY-011456534, 2/18 (between "Peter Contract**  
 8 **Review/Feedback" and "We didn't even want"; between "Play Points" and "July 1<sup>st</sup>").** This text  
 9 contains confidential, non-public information purporting to reveal a developer's statements made  
 10 during negotiations with Google, including with respect to confidential deal terms. Disclosure of this  
 11 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 12 decision-making, which, for example, could give a competitor or potential business partner unfair  
 13 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 14 this non-party information to unfairly target Google's developer partners.

15       **72. Exhibit 22, GOOG-PLAY-011456538, 1/6/21 (between "UAC" and "AVP deal").**  
 16 This text contains confidential, non-public information purporting to reveal a developer's statements  
 17 made during negotiations with Google, including with respect to confidential financial deal terms.  
 18 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
 19 strategic decision-making, which, for example, could give a competitor or potential business partner  
 20 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
 21 could use this non-party information to unfairly target Google's developer partners.

22       **73. Exhibit 22, GOOG-PLAY-011456539, 1/6/21 (between "Promotions" and**  
 23 **"Marketing spend"; between "Marketing spend" and "10/13").** This text contains confidential,  
 24 non-public information purporting to reveal a developer's statements made during negotiations with  
 25 Google, including with respect to confidential deal terms. Disclosure of this non-public information is  
 26 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 27 example, could give a competitor or potential business partner unfair leverage in competing against or  
 28

negotiating with Google. If revealed, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

74. **Exhibit 22, GOOG-PLAY-011456539, 10/13 (between “into this even more” and “Ian: LTV?”; between “Dhruv” and “Peter: Actually let me check”; between “PLAY POINTS” and “Less interested in installs”).** This text contains confidential, non-public information purporting to reveal a developer’s statements made during negotiations with Google, including with respect to financial assumptions relating to potential deal terms. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

75. **Exhibit 22, GOOG-PLAY-011456540, 10/13 (between “get the spreadsheet” and “Promos=”; between “Promos=” and “Play Points=”; between “Play Points=” and “Cloud”; between “Cloud” and “10/13/20”).** This text contains confidential, non-public information purporting to reveal a developer’s statements made during negotiations with Google, including with respect to confidential financial deal terms relating to the value of offerings from Google. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. If revealed, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

76. **Exhibit 22, GOOG-PLAY-011456540, 10/13/20 (between “Dhruv--” and “Joe -- Across all Android platforms?”; between “not Match or Tinder” and “Joe -- I understand the mechanics now”).** This text contains confidential, non-public information purporting to reveal a developer’s statements made during negotiations with Google, including with respect to confidential financial data. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or

1 potential business partner unfair leverage in competing against or negotiating with Google. If revealed,  
 2 this information could be referenced by potential counterparties in negotiations with Google to gain an  
 3 unfair advantage against Google.

4 77. **Exhibit 22, GOOG-PLAY-011456541, 10/13/20 (between “Danielle - how did you**  
 5 **think about it?” and “SWOOP”).** This text contains confidential, non-public information purporting  
 6 to reveal a developer’s statements made during negotiations with Google, including with respect to  
 7 confidential financial data. Disclosure of this non-public information is likely to result in competitive  
 8 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 9 potential business partner unfair leverage in competing against or negotiating with Google. If revealed,  
 10 this information could be referenced by potential counterparties in negotiations with Google to gain an  
 11 unfair advantage against Google.

12 78. **Exhibit 22, GOOG-PLAY-011456541, 10/13/20 (between “years to come etc.” and**  
 13 **“Summary”).** This text contains confidential, non-public information purporting to reveal a  
 14 developer’s statements made during negotiations with Google, including with respect to confidential  
 15 financial data and financial deal terms. Disclosure of this non-public information is likely to result in  
 16 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
 17 competitor or potential business partner unfair leverage in competing against or negotiating with  
 18 Google. If revealed, this information could be referenced by potential counterparties in negotiations  
 19 with Google to gain an unfair advantage against Google.

20 79. **Exhibit 22, GOOG-PLAY-011456542, 10/13/20 (between “Summary” and “We**  
 21 **could see SWOOP”; between “do some math here” and “Joe, INSTALLS”).** This text contains  
 22 confidential, non-public information purporting to reveal a developer’s statements made during  
 23 negotiations with Google. Disclosure of this non-public information is likely to result in competitive  
 24 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 25 potential business partner unfair leverage in competing against or negotiating with Google. If revealed,  
 26 this information could be referenced by potential counterparties in negotiations with Google to gain an  
 27 unfair advantage against Google.

1           80.     **Exhibit 22, GOOG-PLAY-011456542, 9/28/20 (between “meeting with CFO” and**  
2 **“High Level Feedback from Peter”)**. This text contains confidential, non-public information  
3 regarding deal negotiations between a developer and Google. Disclosure of this non-public information  
4 is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
5 example, could give a competitor or potential business partner unfair leverage in competing against or  
6 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
7 in negotiations with Google to gain an unfair advantage against Google.

8           81.     **Exhibit 22, GOOG-PLAY-011456543, 9/28/20 (between “High Level Feedback**  
9 **from Peter” and “We will give up”; between “Program Spend Summary [estimated spend]” and**  
10 **“9/03/20”)**. This text contains confidential, non-public information purporting to reveal a developer’s  
11 statements made during negotiations with Google, including with respect to confidential financial deal  
12 terms relating to the value of offerings from Google. Disclosure of this non-public information is likely  
13 to result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
14 could give a competitor or potential business partner unfair leverage in competing against or  
15 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
16 in negotiations with Google to gain an unfair advantage against Google.

17           82.     **Exhibit 22, GOOG-PLAY-011456544, 9/03/20 (between “relationship to date” and**  
18 **“Gain buy-in”)**. This text contains confidential, non-public information purporting to reveal a  
19 developer’s statements made during negotiations with Google, including with respect to confidential  
20 financial deal terms relating to the value of offerings from Google. Disclosure of this non-public  
21 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
22 which, for example, could give a competitor or potential business partner unfair leverage in competing  
23 against or negotiating with Google. If revealed, this information could be referenced by potential  
24 counterparties in negotiations with Google to gain an unfair advantage against Google.

25           83.     **Exhibit 22, GOOG-PLAY-011456545, 9/03/20 (between “isolation from sales**  
26 **process” and “Clark”)**. This text contains confidential, non-public information purporting to reveal a  
27 developer’s statements made during negotiations with Google, including with respect to confidential  
28



1 financial deal terms relating to the value of offerings from Google. Disclosure of this non-public  
 2 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
 3 which, for example, could give a competitor or potential business partner unfair leverage in competing  
 4 against or negotiating with Google. If revealed, this information could be referenced by potential  
 5 counterparties in negotiations with Google to gain an unfair advantage against Google.

6 84. **Exhibit 22, GOOG-PLAY-011456546, 8/25/20 (between “Ayesha said yes” and “I**  
 7 **think this points”).** This text contains confidential, non-public information purporting to reveal a  
 8 developer’s statements made during negotiations with Google, including with respect to confidential  
 9 financial data and potential deal terms. Disclosure of this non-public information is likely to result in  
 10 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
 11 competitor or potential business partner unfair leverage in competing against or negotiating with  
 12 Google. If revealed, this information could be referenced by potential counterparties in negotiations  
 13 with Google to gain an unfair advantage against Google.

14 85. **Exhibit 22, GOOG-PLAY-011456547, Commented [28] (between “utilize and think**  
 15 **about” and “share our capabilities”).** This text contains confidential, non-public information relating  
 16 to negotiations between a developer and Google. Disclosure of this non-public information is likely to  
 17 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 18 could give a competitor or potential business partner unfair leverage in competing against or  
 19 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
 20 in negotiations with Google to gain an unfair advantage against Google.

21 86. **Exhibit 22, GOOG-PLAY-011456549, 8/13/20 (between “Joe Confirming**  
 22 **understanding” and “Joe & team”).** This text contains confidential, non-public information relating  
 23 to negotiations between a developer and Google. Disclosure of this non-public information is likely to  
 24 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 25 could give a competitor or potential business partner unfair leverage in competing against or  
 26 negotiating with Google. If revealed, this information could be referenced by potential counterparties  
 27 in negotiations with Google to gain an unfair advantage against Google.

**Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 23 [Dkt 486-24]**  
**(Exhibit A8)**

87. **Exhibit 23, GOOG-PLAY-011665307 (between “(as at 5/25)” and “of apps”;**  
**between “of apps” and “total”; between “of which” and “of app updates”; all numbers under**  
**column “Total Apps”; all numbers under column “Total app updates submitted”; all numbers**  
**under column “Compliant”; all numbers under column “Not Compliant”; Note 1, between**  
**“UCB app” and “API apps”; between “API apps” and “and”; between “and” and “apps**  
**removed”; between “from enclave” and end of sentence).** This text contains non-public and  
 confidential information regarding app submissions on Google Play with respect to Google Play’s  
 payment policy. This information has never been disclosed publicly and the Google Play product team  
 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
 decision-making and business strategies employed by Google’s app store competitors, for example by  
 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 themselves from Google Play in the eyes of U.S. developers.

88. **Exhibit 23, GOOG-PLAY-011665308 (all numbers under column “APK”; all**  
**numbers under column “Parent Name”; Bullet Point 2, between start of sentence and “expected**  
**to be”; Bullet Point 3, between “Other notable apps” and end of sentence).** This text contains  
 confidential, non-public information regarding non-party developers, and implicates the non-party’s  
 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 decision-making, which, for example, could give a competitor or potential business partner unfair  
 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 this non-party information to unfairly target Google’s developer partners.

89. **Exhibit 23, GOOG-PLAY-011665309 (between “Of the” and “apps”; between**  
**“apps” and “of grace exemption”; between “unknown” and “are managed”; between “partner**

apps” and “of the unknowns”; all numbers under column “Total Grace Period Apps”; all numbers under column “Unknown (No Submissions)”; all numbers under column “Has updated apps in 2022”; Note 1, between “UCB app” and “API apps”; between “API apps” and “and”; between “and” and “apps removed”; between “from enclave” and end of sentence). This text contains non-public and confidential information regarding app submissions on Google Play with respect to Google Play’s payment policy. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

90. **Exhibit 23, GOOG-PLAY-011665310 (all numbers under column “Developer”; Note, between “While” and “and”; between “and” and “plan to”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

91. **Exhibit 23, GOOG-PLAY-011665312 (all numbers under column “# of Apps”).** This text contains non-public and confidential information regarding app submissions on Google Play with respect to Google Play’s payment policy. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

92. **Exhibit 23, GOOG-PLAY-011665317 (all numbers under column “APK”; row 22 under column “Match or Ban.”; all numbers under column “Parent Name”; Bullet Point 2, between start of sentence and “expected to be”; Bullet Point 3, between “Other notable apps” and end of sentence).** This text contains non-public and confidential information regarding app submissions on Google Play with respect to Google Play’s payment policy. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

**Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 24 [Dkt 486-25]  
(Exhibit A9)**

93. **Exhibit 24, Page -863 (between “Dev status update” and “Open: KR date”; between “Dev status update” and “Open: KR date”).** This information contains non-public and confidential data regarding an update on developers’ status on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

94. **Exhibit 24, Page -864 (between “Media Experience Program -” and “Dec 2nd”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1           95.     **Exhibit 24, Page -865 (between “(Kerry):” and “like it”; between “Media**  
 2 **Experience Program” and “ETA - Ask”)**. This information contains non-public information  
 3 regarding Google’s confidential non-public internal strategic considerations related to creating value  
 4 for and attracting developers to the Google Play Store and identifies a non-party developer partner.  
 5 This information has never been disclosed publicly. Disclosure of this information would adversely  
 6 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 7 confidential strategies in an effort to attract developers away from Google. Further, revealing the  
 8 identity of a non-party developer, implicates the non-party’s confidentiality interests, who has a  
 9 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 10 confidential statements made during negotiations.

11           96.     **Exhibit 24, Page -866 (between “YT” and “etc. 1. BDMs”; between “b.” and**  
 12 **“followup today.”)**. This text contains confidential, non-public information regarding non-party  
 13 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
 14 business partners who are not party to this litigation, and who have a reasonable expectation that  
 15 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
 16 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
 17 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 18 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 19 Google’s competitors could use this non-party information to unfairly target Google’s developer  
 20 partners.

21           97.     **Exhibit 24, Page -867 (between “b.” and “followup today.”; between “language**  
 22 **(apps...” and “Oct 15”)**. This text contains confidential, non-public information regarding non-party  
 23 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
 24 business partners who are not party to this litigation, and who have a reasonable expectation that  
 25 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
 26 during negotiations. Further, this text contains confidential, non-public information regarding Google’s  
 27 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
 28

1 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
 2 competitor or potential business partner unfair leverage in competing against or negotiating with  
 3 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 4 Google's developer partners.

5 98. **Exhibit 24, Page -870 (between "solution to others" a." and "publishing**  
 6 **integration"; between "console can extend" and "integration successful").** This text contains  
 7 confidential, non-public information regarding non-party developers, and implicates the non-party's  
 8 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 9 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
 10 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 11 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 12 decision-making, which, for example, could give a competitor or potential business partner unfair  
 13 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 14 this non-party information to unfairly target Google's developer partners.

15 99. **Exhibit 24, Page -871 (between "have input from" and "so far"; between "so far"**  
 16 **and "is outstanding"; between "other conversations." and "is a WIP as").** This text contains  
 17 confidential, non-public information regarding non-party developers, and implicates the non-party's  
 18 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 19 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
 20 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 21 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 22 decision-making, which, for example, could give a competitor or potential business partner unfair  
 23 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 24 this non-party information to unfairly target Google's developer partners.

25 100. **Exhibit 24, Page -872 (between "Developers next steps" and "Working doc and**  
 26 **AI's").** This text contains confidential, non-public information regarding non-party developers, and  
 27 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
 28

1 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
2 maintain the confidentiality of contractual terms and its own confidential statements made during  
3 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
4 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
5 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
6 Google's competitors could use this non-party information to unfairly target Google's developer  
7 partners.

8       101. **Exhibit 24, Page -873 (between "Closed for" and "we are making progress";**  
9 **between "the TV apps" and "aGPB / Multiplatform").** This text contains confidential, non-public  
10 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
11 revealing the identity of Google business partners who are not party to this litigation, and who have a  
12 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
13 confidential statements made during negotiations. Further, disclosure of this non-public information is  
14 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
15 example, could give a competitor or potential business partner unfair leverage in competing against or  
16 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
17 unfairly target Google's developer partners.

18       102. **Exhibit 24, Page -875 (between "Examples:" and "applied and are asking";**  
19 **between "the running except" and "Rakutan eng cannot").** This text contains confidential, non-  
20 public information regarding non-party developers, and implicates the non-party's confidentiality  
21 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
22 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
23 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
24 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
25 which, for example, could give a competitor or potential business partner unfair leverage in competing  
26 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
27 information to unfairly target Google's developer partners.



1           103.   **Exhibit 24, Page -876 (between “translated externally (e.g.” and “a. Challenge for**  
 2 **BD”;** **between “digital nuance” and “negotiations are stuck”).** This text contains confidential, non-  
 3 public information regarding non-party developers, and implicates the non-party’s confidentiality  
 4 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
 5 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
 6 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
 7 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
 8 which, for example, could give a competitor or potential business partner unfair leverage in competing  
 9 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
 10 information to unfairly target Google’s developer partners.

11           104.   **Exhibit 24, Page -877 (between “Jul 30, 2021 1.” and “escalation - location”;**  
 12 **between “TVAP d.” and “continues on Rikako”).** This text contains confidential, non-public  
 13 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 14 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 15 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 16 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 17 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 18 example, could give a competitor or potential business partner unfair leverage in competing against or  
 19 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 20 unfairly target Google’s developer partners.

21           105.   **Exhibit 24, Page -878 (between “(Check” and “iii. Danielle Stein”).** This text  
 22 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 23 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 24 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 25 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 26 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 27 decision-making, which, for example, could give a competitor or potential business partner unfair  
 28

1 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
2 this non-party information to unfairly target Google's developer partners.

3       106. **Exhibit 24, Page -884 (between "engage more partners" and "has flagged";**  
4 **between "couple months" and "proposal pending"; between "testing updates" and "Can we**  
5 **plan").** This text contains confidential, non-public information regarding non-party developers, and  
6 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
7 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
8 maintain the confidentiality of contractual terms and its own confidential statements made during  
9 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
10 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
11 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
12 Google's competitors could use this non-party information to unfairly target Google's developer  
13 partners.

14       107. **Exhibit 24, Page -885 (between "abt twitch" and "Can we review").** This text  
15 contains confidential, non-public information regarding non-party developers, and implicates the non-  
16 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
17 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
18 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
19 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
20 decision-making, which, for example, could give a competitor or potential business partner unfair  
21 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
22 this non-party information to unfairly target Google's developer partners.

23       108. **Exhibit 24, Page -889 (between "Working group" and "Next steps: Commerce").**  
24 This text contains confidential, non-public information regarding non-party developers, and implicates  
25 the non-party's confidentiality interests, by revealing the identity of Google business partners who are  
26 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
27 confidentiality of contractual terms and its own confidential statements made during negotiations.

Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

109. **Exhibit 24, Page -890 (between "2021/05/13 1." and "a. May process FOPs"; between "a. Open:" and "Is bundle upgrade allowed"; between "Kang how does" and "feel about now"; between "feel about now c." and "Skilled cross platform"; between "Demonstrable progress" and "YT have communicated"; between "Request from" and "BCAP was approved last").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

110. **Exhibit 24, Page -891 (between "Subs product" and "Internal approvals next"; between "partners status as well" and "No update this week"; between "E.g. Web" and "subscriber upgrades"; between "upgrades to" and "app on Play").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing

1 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
2 information to unfairly target Google’s developer partners.

3       111. **Exhibit 24, Page -892 (between “developers for Sept” and “No points integration”;**  
4 **between “priority for now” and “Multiplatform is open”; between “definition a. YT” and**  
5 **“UCGPB”).** This text contains confidential, non-public information regarding non-party developers,  
6 and implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
7 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
8 maintain the confidentiality of contractual terms and its own confidential statements made during  
9 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
10 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
11 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
12 Google’s competitors could use this non-party information to unfairly target Google’s developer  
13 partners.

14       112. **Exhibit 24, Page -893 (between “ads cuts Monday” and “update – moving**  
15 **forward”; between “UCGPB?” and “update a. Shared UCGPB”).** This text contains confidential,  
16 non-public information regarding non-party developers, and implicates the non-party’s confidentiality  
17 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
18 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
19 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
20 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
21 which, for example, could give a competitor or potential business partner unfair leverage in competing  
22 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
23 information to unfairly target Google’s developer partners.

24       113. **Exhibit 24, Page -894 (between “level of confidence” and “Cross sell app”).** This  
25 text contains confidential, non-public information regarding non-party developers, and implicates the  
26 non-party’s confidentiality interests, by revealing the identity of Google business partners who are not  
27 party to this litigation, and who have a reasonable expectation that Google will maintain the  
28

1 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 2 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 3 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 4 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 5 competitors could use this non-party information to unfairly target Google's developer partners.

6       114.   **Exhibit 24, Page -895 (between "2021 4 6" and "update"; between "Proposed" and**  
 7 **"solution to publish full"; between "a solution for" and "Console OK"; between "[FYI]" and**  
 8 **"finalizing detailed integration"; between "integration proposal for" and "to:"; between "to**  
 9 **their main" and "Books app"; between "and discuss with" and "Console alignment").** This text  
 10 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 11 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
 12 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 13 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 14 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 15 decision-making, which, for example, could give a competitor or potential business partner unfair  
 16 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 17 this non-party information to unfairly target Google's developer partners.

18       115.   **Exhibit 24, Page -896 (between "Gordon tracking" and "partners"; between**  
 19 **"2021-3-25" and "Discussed with"; between "Discussed with" and "details of proposal"; between**  
 20 **"of proposal for" and "to publish their").** This text contains confidential, non-public information  
 21 regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing  
 22 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
 23 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 24 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 25 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 26 could give a competitor or potential business partner unfair leverage in competing against or  
 27  
 28

1 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 2 unfairly target Google’s developer partners.

3 116. Exhibit 24, Page -897 (between “whatever we need to” and “MGPB”; between  
 4 “Priorities for the week” and “path decision”; between “AGBP Updates” and “satisfied by per-  
 5 transaction”; between “Important for” and “deal.”). This text contains confidential, non-public  
 6 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 7 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 8 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 9 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 10 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 11 example, could give a competitor or potential business partner unfair leverage in competing against or  
 12 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 13 unfairly target Google’s developer partners.

14 117. Exhibit 24, Page -899 (between “Large number of SKU” and “2021-3-05”; between  
 15 “from YT and” and end of sentence). This text contains confidential, non-public information  
 16 regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing  
 17 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
 18 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 19 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 20 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 21 could give a competitor or potential business partner unfair leverage in competing against or  
 22 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 23 unfairly target Google’s developer partners.

24 118. Exhibit 24, Page -900 (between “critical blocking issue” and “need to give guidance  
 25 on”; between “hitting enforcement date” and “Blocked, Bec”; between “Kang update on” and  
 26 “Alpha launch from”; between “Alpha launch from” and “in April; pending”; between “share  
 27 the implementation” and “all deals by May”; between “May on track” and “In version”;

1 **between “number of SKU” and end of sentence).** This text contains confidential, non-public  
 2 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 3 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 4 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 5 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 6 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 7 example, could give a competitor or potential business partner unfair leverage in competing against or  
 8 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 9 unfairly target Google’s developer partners.

10 119. **Exhibit 24, Page -901 (between “blocking issue for” and “need to give”; between**  
 11 **“hitting enforcement date” and “Blocked, Bec”; between “additional partners including” and**  
 12 **[Olivia/DanielleM] Are there any”; between “info from YT and” and “11. KR”).** This text  
 13 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 14 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 15 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 16 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 17 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 18 decision-making, which, for example, could give a competitor or potential business partner unfair  
 19 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 20 this non-party information to unfairly target Google’s developer partners.

21 120. **Exhibit 24, Page -904 (between “Partners” and “Email testing in”; between “legal**  
 22 **call next week” and “Ebook devs have”; between “number of SKU” issue” and “No major**  
 23 **update”; between “No major update” and “1 day subs and”).** This text contains confidential, non-  
 24 public information regarding non-party developers, and implicates the non-party’s confidentiality  
 25 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
 26 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
 27 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
 28



information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

121. **Exhibit 24, Page -906 (between "rate is currently" and "meaning that there"; between "that there are" and "apps didn't comply"; between "Partners Update" and "Working on aligning"; between "international pricing updates" and "Meeting yesterday and"; between "might be a good POC" and "also should be engaged"; between "Austin" and "Provided offer and waiting").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, this text contains non-public and confidential data regarding app developers payments compliance rates on Google Play. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

122. **Exhibit 24, Page -907 (between "engs heads up" and "-modular"; between "phasing some things" and "- Opt out pricing").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or

1 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 2 unfairly target Google’s developer partners.

3       123. **Exhibit 24, Page -908 (between “role in carriers (e.g.” and “into this plan”;**  
 4 **between “card promotion with” and “Closed”).** This text contains confidential, non-public  
 5 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 6 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 7 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 8 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 9 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 10 example, could give a competitor or potential business partner unfair leverage in competing against or  
 11 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 12 unfairly target Google’s developer partners.

13       124. **Exhibit 24, Page -909 (between “Opens for policy” and “Ask what they”; between**  
 14 **“will be sending to” and “1/22”; between “card promotion with” and “Rollup to KR”).** This text  
 15 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 16 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 17 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 18 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 19 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 20 decision-making, which, for example, could give a competitor or potential business partner unfair  
 21 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 22 this non-party information to unfairly target Google’s developer partners.

23       125. **Exhibit 24, Page -910 (between “Opens for policy” and “Next steps.”; between**  
 24 **“align with” and “legal on Country”; between “card promotion with” and “Rollup to KR”).** This  
 25 text contains confidential, non-public information regarding non-party developers, and implicates the  
 26 non-party’s confidentiality interests, by revealing the identity of Google business partners who are not  
 27 party to this litigation, and who have a reasonable expectation that Google will maintain the  
 28

1 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 2 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 3 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 4 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 5 competitors could use this non-party information to unfairly target Google's developer partners.

6       **126. Exhibit 24, Page -911 (between "Pex approval was for" and "etc"; between "Next**  
 7 **step: offer to" and "in Jan"; between "G1" and "YT, Books, Movies").** This text contains  
 8 confidential, non-public information regarding non-party developers, and implicates the non-party's  
 9 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 10 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
 11 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 12 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 13 decision-making, which, for example, could give a competitor or potential business partner unfair  
 14 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 15 this non-party information to unfairly target Google's developer partners.

16       **127. Exhibit 24, Page -912 (between "Review" and "Operator language"; between "In**  
 17 **app comms &" and "& gift cards").** This text contains confidential, non-public information  
 18 regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing  
 19 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
 20 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 21 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 22 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 23 could give a competitor or potential business partner unfair leverage in competing against or  
 24 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
 25 unfairly target Google's developer partners.

26       **128. Exhibit 24, Page -913 (between "Fraud vector –" and "is putting a proposal";**  
 27 **between "to talk to" and "previous writeup"; between "what we offer to" and "revisit in Jan";**

1 **between “just a writeup” and “and stadia is”).** This text contains confidential, non-public  
 2 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 3 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 4 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 5 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 6 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 7 example, could give a competitor or potential business partner unfair leverage in competing against or  
 8 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 9 unfairly target Google’s developer partners.

10 **129. Exhibit 24, Page -915 (between “X functional meet.” and “MGPB Workback”).**

11 This text contains confidential, non-public information regarding non-party developers, and implicates  
 12 the non-party’s confidentiality interests, by revealing the identity of Google business partners who are  
 13 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
 14 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 15 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 16 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 17 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 18 competitors could use this non-party information to unfairly target Google’s developer partners.

19 **130. Exhibit 24, Page -917 (between “conversion for exception” and “Summit. Next**  
 20 **week”).** This text contains confidential, non-public information regarding non-party developers, and  
 21 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
 22 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
 23 maintain the confidentiality of contractual terms and its own confidential statements made during  
 24 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 25 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 26 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,

Google's competitors could use this non-party information to unfairly target Google's developer partners.

131. **Exhibit 24, Page -918 (between "being closely managed" and "Al: Divya Chandra"; between "Meeting next week." and "Danielle Stein Contagion").** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

132. **Exhibit 24, Page -920 (between "Consolidate asks" and "needs escalation"; between "Not on AVP" and "counter proposal given"; between "counter proposal given" and "thinking over the proposal for a week"; between "not available for" and "(Only for ATV Launcher"; between "carriers contractual discussion" and "29<sup>th</sup> ideation meeting").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

133. **Exhibit 24, Page -922 (between "Progress :-)" and "counter proposal given"; between "counter proposal given" and "pitch MGBP"; between "pitch MGBP" and "meeting on 29<sup>th</sup>").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during

1 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 2 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 3 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 4 Google's competitors could use this non-party information to unfairly target Google's developer  
 5 partners.

6 134. **Exhibit 24, Page -923 (between "Progress :-)" and "counter proposal given";**  
 7 **between "counter proposal given" and "pitch MGBP"; between "pitch MGBP" and "meeting on**  
 8 **29<sup>th</sup>)**). This text contains confidential, non-public information regarding non-party developers, and  
 9 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
 10 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
 11 maintain the confidentiality of contractual terms and its own confidential statements made during  
 12 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 13 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 14 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 15 Google's competitors could use this non-party information to unfairly target Google's developer  
 16 partners.

17 135. **Exhibit 24, Page -924 (between "Design blog post" and "Payments followup")**. This  
 18 text contains confidential, non-public information regarding non-party developers, and implicates the  
 19 non-party's confidentiality interests, by revealing the identity of Google business partners who are not  
 20 party to this litigation, and who have a reasonable expectation that Google will maintain the  
 21 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 22 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 23 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 24 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 25 competitors could use this non-party information to unfairly target Google's developer partners.

26 136. **Exhibit 24, Page -925 (between "Large games groups" and "have sophisticated**  
 27 **billing")**. This text contains confidential, non-public information regarding non-party developers, and  
 28

implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**137. Exhibit 24, Page -926 (between "Thanksgiving started" and "K-internet send").**

This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**138. Exhibit 24, Page -927 (between "announcement workstreams" and "Product: in app"; between "new proposal targeted" and "Similar product to"; between "Similar product to" and "Meeting? AI").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover,



1 Google's competitors could use this non-party information to unfairly target Google's developer  
2 partners.

3 139. Exhibit 24, Page -928 (between "policy no escalations" and "Apps coalition:  
4 neutral"; between "after the announcement" and "Explained programmes"; between "user  
5 promotion" and "asked about the velocity"; between "interaction taking place now" and "are  
6 top of mind"; between "category is concerned" and "deeper discussion"; between "deeper  
7 discussion on" and "on going"; between "Prebrief for" and "pending OTT players"; between  
8 "takedown on security issue" and "working to get it back"). This text contains confidential, non-  
9 public information regarding non-party developers, and implicates the non-party's confidentiality  
10 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
11 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
12 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
13 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
14 which, for example, could give a competitor or potential business partner unfair leverage in competing  
15 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
16 information to unfairly target Google's developer partners.

17 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 26 [Dkt 486-27]**  
18 **(Exhibit A10)**

19 140. Exhibit 26, Page 2 of 3 (GOOG-PLAY-011363671 between "main collaboration  
20 opportunities:" and end of sentence). This text contains non-public and confidential information  
21 regarding potential deals and collaborative efforts that Google discussed with a developer. This  
22 information has never been disclosed publicly and the Google Play product team treats it as strictly  
23 confidential. If publicly revealed, this information could influence the competitive decision-making  
24 and business strategies employed by Google's app store competitors, for example by influencing how  
25 those app stores market themselves to developers and how they distinguish themselves from Google  
26 Play in the eyes of developers. In addition, revealing the statements made during Google's  
27 negotiations, including potential collaborative opportunities that Google discussed with developers,  
28

could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

**Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 27 [Dkt 486-28]**

**(Exhibit A11)**

141. **Exhibit 27, Page 5 of 7 (GOOG-PLAY-011270140 first paragraph between “there are still gaps which are going to hurt user experience and revenue.” and end of paragraph).** This text contains non-public and confidential information regarding specific features and technical details of Google Play’s billing platform, about which a developer expressed concerns. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers. In addition, revealing the statements made during Google’s negotiations with developers, including concerns raised by developers about specific aspects of Google Play, could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

142. **Exhibit 27, Page 5 of 7 (GOOG-PLAY-011270140, middle of page between “We would deploy this across our platforms and globally assuming” and “We would work with”).** This text contains confidential, non-public information regarding Google’s agreements with a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Further, the disclosure of the developer’s highly confidential information would significantly harm the developer’s business. For example, its competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from

1 coming to fruition, the developer proactively maintains the confidentiality of its strategic information,  
2 only disclosing it to a select group of individuals on an as-needed basis.

3 143. **Exhibit 27, Page 6 of 7 (GOOG-PLAY-011270141 first paragraph between**  
4 **“wanted to relay what I heard about the status.” and end of the paragraph).** This text contains  
5 non-public and confidential information regarding specific features and technical details of Google  
6 Play’s billing platform, about which a developer expressed concerns. This information has never been  
7 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
8 revealed, this information could influence the competitive decision-making and business strategies  
9 employed by Google’s app store competitors, for example by influencing how those app stores market  
10 themselves to developers and how they distinguish themselves from Google Play in the eyes of  
11 developers. In addition, revealing the statements made during Google’s negotiations with developers,  
12 including concerns raised by developers about specific aspects of Google Play, could influence the  
13 negotiating strategies and tactics employed by app developers and other current and prospective  
14 counterparties with which Google does or may transact business.

15 **Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 28 [Dkt 486-29]**  
16 **(Exhibit A12)**

17 144. **Exhibit 28, Page 4 of 4 (GOOG-PLAY-011220644 third bullet point between “In**  
18 **the interim, our offer” and “still stands. We'd be”).** This text contains non-public and confidential  
19 information regarding specific deal terms offered by Google to a developer. This information has never  
20 been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
21 revealed, this information could influence the competitive decision-making and business strategies  
22 employed by Google’s app store competitors, for example by influencing how those app stores market  
23 themselves to developers and how they distinguish themselves from Google Play in the eyes of  
24 developers. Google’s competitors could use this information to unfairly target Google's developer  
25 partners and offer specific deal terms designed to undercut those offered by Google. In addition,  
26 revealing the statements made by Google during its negotiations with developers could influence the  
27  
28

1 negotiating strategies and tactics employed by app developers and other current and prospective  
2 counterparties with which Google does or may transact business.

3 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 30 [Dkt 486-31]**

4 **(Exhibit A13)**

5 145. **Exhibit 30, Page 7 of 7 (first paragraph between “Google’s damages from lost**  
6 **service fees to be” and “and restitution for”; between “at least in the range of” and end of**  
7 **sentence; second paragraph between “and July 2022 to range from” and “to”; from “to” to end**  
8 **of sentence).** This information reflects and is calculated from internal, non-public Google financial  
9 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
10 public, and if revealed to competitors and potential business counterparties, could be used to  
11 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
12 Google financial information.

13 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 32 [Dkt 486-34]**

14 **(Exhibit A14)**

15 146. **Exhibit 32, Page -903 (entire image below “Projected Revenue Loss to Play from**  
16 **Tinder de-integration”).** This exhibit contains non-public and confidential data regarding Google’s  
17 projected revenue losses that could result from Tinder’s de-integration. This information has never  
18 been disclosed publicly and the Google Play product team treats it as strictly confidential. It includes  
19 information that reflects and is calculated from internal, non-public Google financial data, which  
20 Google spends significant resources compiling and maintaining. If revealed to competitors and  
21 potential business counterparties, this valuable, non-public data could be used to disadvantage and  
22 cause Google competitive harm by giving competitors insight into confidential Google financial  
23 information. For example, if publicly revealed, this information could influence the negotiating  
24 strategies and tactics employed by app developers and other current and prospective counterparties  
25 with which Google does or may transact business.

26 147. **Exhibit 32, Page -904 third bullet point (between “Match.com represents” and**  
27 **“opportunity and has been actively”).** This exhibit contains non-public and confidential data

1 regarding the value of particular business opportunities relating to specific developers. This  
 2 information has never been disclosed publicly and the Google Play product team treats it as strictly  
 3 confidential. It includes information that reflects and is calculated from internal, non-public Google  
 4 financial data, which Google spends significant resources compiling and maintaining. If revealed to  
 5 competitors and potential business counterparties, this valuable, non-public data could be used to  
 6 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 7 Google financial information. For example, if publicly revealed, this information could influence the  
 8 negotiating strategies and tactics employed by app developers and other current and prospective  
 9 counterparties with which Google does or may transact business.

10 148. **Exhibit 32, Page -905 (text within “Option #2” column, between “-Consumer**  
 11 **Spend:” and “(Period: 2018Q1-2019Q1)\*).** This exhibit contains non-public and confidential data  
 12 regarding the value of particular business opportunities relating to specific developers. This  
 13 information has never been disclosed publicly and the Google Play product team treats it as strictly  
 14 confidential. It includes information that reflects and is calculated from internal, non-public Google  
 15 financial data, which Google spends significant resources compiling and maintaining. If revealed to  
 16 competitors and potential business counterparties, this valuable, non-public data could be used to  
 17 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 18 Google financial information. For example, if publicly revealed, this information could influence the  
 19 negotiating strategies and tactics employed by app developers and other current and prospective  
 20 counterparties with which Google does or may transact business.

21 149. **Exhibit 32, Page -908 (all text below the heading “In exchange for Hug: Android**  
 22 **investment to include, but not limited to” and to the left of the “Tinder” images.).** This text  
 23 contains confidential, non-public information regarding Google’s agreements with developers,  
 24 including specific deal terms contemplated or offered by Google. Disclosure of this non-public  
 25 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
 26 making which, for example, could give a competitor or potential business partner unfair leverage in  
 27 competing against or negotiating with Google. Moreover, Google’s competitors could use this

1 information to unfairly target Google's other developer partners and offer specific deal terms designed  
2 to undercut those offered by Google.

3       150.   **Exhibit 32, Page -909 (all text and images in box below “Play will invest across**  
4 **Google to accelerate your success”;** entire paragraph below box). This portion of the exhibit  
5 contains confidential, non-public information regarding Google’s agreements with developers,  
6 including specific deal terms contemplated or offered by Google. Disclosure of this non-public  
7 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
8 making which, for example, could give a competitor or potential business partner unfair leverage in  
9 competing against or negotiating with Google. Moreover, Google’s competitors could use this  
10 information to unfairly target Google's other developer partners and offer specific deal terms designed  
11 to undercut those offered by Google. Furthermore, the text below the box includes information that  
12 reflects and is calculated from internal, non-public Google financial data, which Google spends  
13 significant resources compiling and maintaining. If revealed to competitors and potential business  
14 counterparties, this valuable, non-public data could be used to disadvantage and cause Google  
15 competitive harm by giving competitors insight into confidential Google financial information.

16       151.   **Exhibit 32, Page -910 (all text in box below header “Tinder - Cross-Google Service**  
17 **Pack Offering (Program Impact)”;** entire paragraph below box). This portion of the exhibit  
18 contains confidential, non-public information regarding Google’s agreements with developers,  
19 including specific deal terms contemplated or offered by Google. Disclosure of this non-public  
20 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
21 making which, for example, could give a competitor or potential business partner unfair leverage in  
22 competing against or negotiating with Google. Moreover, Google’s competitors could use this  
23 information to unfairly target Google's other developer partners and offer specific deal terms designed  
24 to undercut those offered by Google

25       152.   **Exhibit 32, Page -911 (text in box below header “Match Group - Cross-Google**  
26 **Service Pack Offering (Program Impact)”).** This portion of the exhibit contains confidential, non-  
27 public information regarding Google’s agreements with developers, including specific deal terms  
28

1 contemplated or offered by Google. Disclosure of this non-public information is likely to result in  
 2 competitive harm to Google, as it reveals Google's strategic decision-making which, for example,  
 3 could give a competitor or potential business partner unfair leverage in competing against or  
 4 negotiating with Google. Moreover, Google's competitors could use this information to unfairly target  
 5 Google's other developer partners and offer specific deal terms designed to undercut those offered by  
 6 Google

7       **153. Exhibit 32, Page -913 (text between "Currently offered Hug" and "offers and**  
 8 **service level"; all text in box below "Currently offered Hug" and "offers and service level").** This  
 9 portion of the exhibit contains confidential, non-public information regarding Google's agreements  
 10 with developers, including specific deal terms contemplated or offered by Google. Disclosure of this  
 11 non-public information is likely to result in competitive harm to Google, as it reveals Google's  
 12 strategic decision-making which, for example, could give a competitor or potential business partner  
 13 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
 14 could use this information to unfairly target Google's other developer partners and offer specific deal  
 15 terms designed to undercut those offered by Google.

16       **154. Exhibit 32, Page -914 (entire image including all text).** This page of the exhibit  
 17 contains confidential, non-public information regarding Google's agreements with developers,  
 18 including specific deal terms contemplated or offered by Google. Disclosure of this non-public  
 19 information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-  
 20 making which, for example, could give a competitor or potential business partner unfair leverage in  
 21 competing against or negotiating with Google. Moreover, Google's competitors could use this  
 22 information to unfairly target Google's other developer partners and offer specific deal terms designed  
 23 to undercut those offered by Google.

24       **155. Exhibit 32, Page -916 (all text in box below header "Hug - Cross-Google Service**  
 25 **Pack Offering (Program Details)").** This portion of the exhibit contains confidential, non-public  
 26 information regarding Google's agreements with developers, including specific deal terms  
 27 contemplated or offered by Google.. Disclosure of this non-public information is likely to result in  
 28



1 competitive harm to Google, as it reveals Google’s strategic decision-making which, for example,  
 2 could give a competitor or potential business partner unfair leverage in competing against or  
 3 negotiating with Google. Moreover, Google’s competitors could use this information to unfairly target  
 4 Google's other developer partners and offer specific deal terms designed to undercut those offered by  
 5 Google.

6 **Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 33 [Dkt 486-35]**

7 **(Exhibit A15)**

8 156. **Exhibit 33, GOOG-PLAY-011667035 (entire chart).** This text contains confidential,  
 9 non-public information regarding non-party developers, and implicates the non-party’s confidentiality  
 10 interests, by revealing the identity and confidential information of Google business partners who are  
 11 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
 12 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 13 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 14 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 15 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 16 competitors could use this non-party information to unfairly target Google’s developer partners.

17 **Match Plaintiffs’ Motion for Partial Summary Judgment - Exhibit 34 [Dkt 486-35]**

18 **(Exhibit A16)**

19 157. **Exhibit 34, GOOG-PLAY-011700994 (text between “India landscape” and**  
 20 **“Critical features”; between “by current programs” and “If we delay”).** This text contains non-  
 21 public and confidential information regarding Google’s strategy with respect to Indian developers and  
 22 consumers. This information has never been disclosed publicly and the Google Play product team  
 23 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
 24 decision-making and business strategies employed by Google’s app store competitors, for example by  
 25 influencing how those app stores market themselves to Indian developers and how they distinguish  
 26 themselves from Google Play in the eyes of Indian developers. In addition, Disclosure of this non-  
 27 public information is likely to result in competitive harm to Google, as it reveals Google’s strategic  
 28

1 decision-making which, for example, could give a competitor or potential business partner unfair  
2 leverage in competing against or negotiating with Google.

3 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 41 [Dkt 486-42]**

4 **(Exhibit A17)**

5 158. **Exhibit 41, Page 148, Line 17 (between "that analysis showing" and end of**  
6 **sentence).** This text contains non-public information regarding Google's confidential non-public  
7 internal strategic considerations related to creating value for and attracting developers to the Google  
8 Play Store, including analysis based on confidential financial data relating to a specific developer. This  
9 information has never been disclosed publicly. Disclosure of this information would adversely impact  
10 Google's current competitive position by enabling Google's competitors to mimic its confidential  
11 strategies in an effort to attract developers away from Google. Moreover, Google's competitors could  
12 use this non-party information to unfairly target Google's developer partners.

13 **Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 44 [Dkt 486-45]**

14 **(Exhibit A18)**

15 159. **Exhibit 44, Page 164, Line 19 (between "that relate to" and end of sentence).** This  
16 text contains confidential, non-public information regarding Google's negotiations with developers,  
17 including the identity of specific deals and programs that were discussed. Disclosure of this non-public  
18 information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-  
19 making which, for example, could give a competitor or potential business partner unfair leverage in  
20 competing against or negotiating with Google.

21 160. **Exhibit 44, Page 164, Line 22 (between "Sometimes it was about" and end of**  
22 **sentence).** This text contains confidential, non-public information regarding Google's negotiations  
23 with developers, including the identity of specific deals and programs that were discussed. Disclosure  
24 of this non-public information is likely to result in competitive harm to Google, as it reveals Google's  
25 strategic decision-making which, for example, could give a competitor or potential business partner  
26 unfair leverage in competing against or negotiating with Google.



## (Exhibit B2)

164. Exhibit 2, Page -092 (all logos in column to the left and above “Epic” and above “Inquiring”; all logos below “tinder” and above “De-integrated / In process”; all logos in column below and to the right of “Match” and above “Never Integrated”). This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

165. Exhibit 2, Page -100 (between “More than 116 billion downloads from Google Play last year” and “We connect developers with a consumer base that “Trusts the platform”). This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

166. Exhibit 2, Page -101, Developer Notes (between “downloads in the last year” and “Trusts the platform”; between “apps on users’ devices” and “Can transact seamlessly”). This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.



(Exhibit B4)

169. **Exhibit 10, Page -385 (all company logos below text not including Match and Tinder).** This information contains non-public and confidential data regarding developer behavior and activity on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

170. **Exhibit 10, Page -387 (all company logos to the right of text not including Match).** This information contains non-public and confidential data regarding developer behavior and activity on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

1           **171. Exhibit 10, Page -388 (first line of text below box between “adopt Android**  
2 **TV/chromecast” and end of line; second line of text between “agreeable rev share terms” and**  
3 **end of line).** This information contains non-public information regarding Google’s confidential non-  
4 public internal strategic considerations related to creating value for and attracting developers to the  
5 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
6 would adversely impact Google’s current competitive position by enabling Google’s competitors to  
7 mimic its confidential strategies in an effort to attract developers away from Google.

8           **172. Exhibit 10, Page -389 (entire image).** This information contains non-public and  
9 confidential data regarding Google’s relationships and initiatives regarding developers on Google Play.  
10 This information has never been disclosed publicly and the Google Play product team treats it as  
11 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
12 making and business strategies employed by Google’s app store competitors, for example by  
13 influencing how those app stores market themselves to U.S. developers and how they distinguish  
14 themselves from Google Play in the eyes of U.S. developers. The disclosure of developers’ highly  
15 confidential information would significantly harm developers’ business. For example, developers’  
16 competitors could leverage this information to reap an unearned competitive advantage. They could  
17 exploit this information—that they otherwise would not have access to—to inform their own business  
18 strategies. To prevent these competitive harms from coming to fruition, developers proactively  
19 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
20 individuals on an as-needed basis. This information also contains non-public information regarding  
21 Google’s confidential non-public internal strategic considerations related to creating value for and  
22 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
23 Disclosure of this information would adversely impact Google’s current competitive position by  
24 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
25 away from Google.

26           **173. Exhibit 10, Page -390 (entire image).** This information contains non-public and  
27 confidential data regarding Google’s relationships and initiatives regarding developers on Google Play.



1 This information has never been disclosed publicly and the Google Play product team treats it as  
 2 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 3 making and business strategies employed by Google’s app store competitors, for example by  
 4 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 5 themselves from Google Play in the eyes of U.S. developers. The disclosure of developers’ highly  
 6 confidential information would significantly harm developers’ business. For example, developers’  
 7 competitors could leverage this information to reap an unearned competitive advantage. They could  
 8 exploit this information—that they otherwise would not have access to—to inform their own business  
 9 strategies. To prevent these competitive harms from coming to fruition, developers proactively  
 10 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
 11 individuals on an as-needed basis. This information also contains non-public information regarding  
 12 Google’s confidential non-public internal strategic considerations related to creating value for and  
 13 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
 14 Disclosure of this information would adversely impact Google’s current competitive position by  
 15 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
 16 away from Google.

17 **174. Exhibit 10, Page -392 (between beginning of first sentence inside box and**  
 18 **“developer list:” text in row between Match Meetic and end of row; text in row between “Tinder**  
 19 **Pairs Plentyoffish okCupid” and end for row; text in row after “Hinge and end of row; text**  
 20 **below box from first sentence and “Dating: Match (Tinder, Match, Pairs, Plentyoffish, okCupid,**  
 21 **Hinge, Meetic),”;** text between **“Dating: Match (Tinder, Match, Pairs, Plentyoffish, okCupid,**  
 22 **Hinge, Meetic),” and end of paragraph).** This text contains confidential, non-public information  
 23 regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing  
 24 the identity of Google business partners who are not party to this litigation, and who has a reasonable  
 25 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 26 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 27 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 28

could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners..

**175. Exhibit 10, Page -393 (below “Program will have eligibility criteria and developer obligations” and to the right of “Programs & Developer Eligibility Criteria”; text to the right of “Developer Obligation”).** This information contains non-public and confidential data regarding Google’s relationships and initiatives regarding developers on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. The disclosure of developers’ highly confidential information would significantly harm developers’ business. For example, developers’ competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. This information also contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**176. Exhibit 10, Page -395 (all text in column below “Status Update - - Pilot Approved 5/13” and to the right of “Plan to offer the App Accelerator”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and

its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**177. Exhibit 10, Page -398 (entire contents of box above "Want to land with news big").** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**178. Exhibit 10, Page -399 (contents of row to the right of "Friendly"; contents of row to the right of "Friendly but not integrated"; contents of row to the right of "Not friendly not integrated").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**179. Exhibit 10, Page -400 (contents of column below "Offer to Developer" and to the right of "Subscriber Acquisition and Retention"; contents of column below "Offer to Developer" and to the right of "Infrastructure Cost Reduction").** This information contains non-public and confidential data regarding developer outreach and relations on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly

confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. This information also contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 11**

**[Dkt. No. 506-12]**

**(Exhibit B5)**

180. **Exhibit 11, Page 232, Lines 1-5 (between "doc, there's" and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with developers, including specific dollar amounts that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 13**

**[Dkt. No. 506-14]**

**(Exhibit B6)**

181. **Exhibit 13, Page -671, Wed, Jun 5, 2019 at 1:51 PM email (between "similar convo like we did with" and "(with a smaller group)).** This text contains confidential, non-public information regarding Google's agreements with non-party developers, including the identity of a specific developer with whom Google discussed or reached agreements. This non-party has a

reasonable expectation that Google will maintain the confidentiality of any private negotiations that may have taken place, including the fact of such negotiations and any confidential statements made during such negotiations. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 16**

**[Dkt. No. 506-17]**

**(Exhibit B7)**

182. **Exhibit 16, Page -230 (text in green below "Q2 2021" and above "AVP Deals Start").** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

183. **Exhibit 16, Page -231 (entire table).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. This text also contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use

1 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
2 designed to undercut those offered by Google.

3 184. **Exhibit 16, Page -232 (between “Added” and “to this list”).** This text contains  
4 confidential, non-public information regarding non-party developers, and implicates the non-party’s  
5 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
6 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
7 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
8 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
9 decision-making, which, for example, could give a competitor or potential business partner unfair  
10 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
11 this non-party information to unfairly target Google’s developer partners.

12 185. **Exhibit 16, Page -233 (entire table).** This information contains non-public information  
13 regarding Google’s confidential non-public internal strategic considerations related to creating value  
14 for and attracting developers to the Google Play Store. This information has never been disclosed  
15 publicly. Disclosure of this information would adversely impact Google’s current competitive position  
16 by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
17 away from Google.

18 186. **Exhibit 16, Page -235 (between “AVP as there is” and “for co-investments to”;**  
19 **between “ADAP certification stage:” and “ADAP pitch”;** **between “KR partners” and “KR:**  
20 **currently aligning”).** This text contains confidential, non-public information regarding non-party  
21 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
22 business partners who are not party to this litigation, and who have a reasonable expectation that  
23 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
24 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
25 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
26 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
27  
28

Google's competitors could use this non-party information to unfairly target Google's developer partners.

187. **Exhibit 16, Page -236 (entire table).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. This text also contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 17**  
**[Dkt. No. 506-18]**  
**(Exhibit B8)**

188. **Exhibit 17, Page -496 (top of page, between "Match Group /" and "Meeting June 2021"; second paragraph, between "reiterate to Gary that" and end of paragraph; first bullet point, between "Reiterate spirit &" and end of sentence; second bullet, between "identified as deal" and end of sentence; third bullet, between "Match's next steps:" and end of sentence; between "bias is the former" and "continue to work cooperatively"; between "EXECUTIVE SUMMARY" and end of page).** This text contains confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's



competitors could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

**189. Exhibit 17, Page -497 (entire page).** This text contains highly detailed, confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

**190. Exhibit 17, Page -498 (between "(consistent" and "DETAILED TALKING POINTS"; between "This change will not go away in 3" and end of page).** This text contains highly detailed, confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

**191. Exhibit 17, Page -499 (between "PRIVILEGED & CONFIDENTIAL" and "As this is your first conversation"; between "crafting a win-win" and "Do you think Google/Play's").** This text contains highly detailed, confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors

could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 18**

**[Dkt. No. 506-19]**

**(Exhibit B9)**

192. **Exhibit 18, Page -245 (between "Next steps with" and "Key business terms").** This text contains confidential, non-public information regarding Google's negotiations with developers, including specific agreements or programs that were discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

193. **Exhibit 18, Page -246 (between "Note:" and "Not much. Value of"; between "Value of" and "is primarily adoption"; between "Draw hard lines:" and "Use Gary/Don").** This text contains highly detailed, confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this information to unfairly target Google's other developer partners and offer specific deal terms designed to undercut those offered by Google.

194. **Exhibit 18, Page -247 (entire page).** This text contains highly detailed, confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were offered or discussed. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this information to unfairly target

1 Google's other developer partners and offer specific deal terms designed to undercut those offered by  
2 Google.

3 **195. Exhibit 18, Page -249 (between “30% (have” and “Indifferent to whether”; entire**  
4 **table).** This portion of the exhibit contains highly detailed, confidential, non-public information  
5 regarding Google’s negotiations with developers, including specific deal terms that were offered or  
6 discussed. Disclosure of this non-public information is likely to result in competitive harm to Google,  
7 as it reveals Google’s strategic decision-making which, for example, could give a competitor or  
8 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
9 Google’s competitors could use this information to unfairly target Google's other developer partners  
10 and offer specific deal terms designed to undercut those offered by Google.

11 **196. Exhibit 18, Page -250 (between “pre-June 30th)” and “\_Reassigned to Danielle**  
12 **Martinak\_”).** This text contains confidential, non-public information regarding Google’s negotiations  
13 with developers. Disclosure of this non-public information is likely to result in competitive harm to  
14 Google, as it reveals Google’s strategic decision-making which, for example, could give a competitor  
15 or potential business partner unfair leverage in competing against or negotiating with Google.  
16 Moreover, Google’s competitors could use this information to unfairly target Google's other developer  
17 partners and offer specific deal terms designed to undercut those offered by Google.

18 **197. Exhibit 18, Page -251 (between “Stretch time as long as possible” and end of slide).**  
19 This text contains confidential, non-public information regarding Google’s strategic thinking with  
20 respect to negotiating agreements with developers. This information has never been disclosed publicly  
21 and the Google Play product team treats it as strictly confidential. Disclosure of this non-public  
22 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
23 making which, for example, could give a competitor or potential business partner unfair leverage in  
24 competing against or negotiating with Google. Moreover, if publicly revealed, this information could  
25 influence the competitive business strategies employed by Google’s app store competitors, for example  
26 by influencing how those app stores market themselves to developers and how they distinguish  
27 themselves from Google Play in the eyes of developers.

1           **198. Exhibit 18, Page -252 (entire page).** This text contains confidential, non-public  
 2 information regarding Google’s strategic thinking with respect to negotiating agreements with  
 3 developers. This information has never been disclosed publicly and the Google Play product team  
 4 treats it as strictly confidential. Disclosure of this non-public information is likely to result in  
 5 competitive harm to Google, as it reveals Google’s strategic decision-making which, for example,  
 6 could give a competitor or potential business partner unfair leverage in competing against or  
 7 negotiating with Google. Moreover, if publicly revealed, this information could influence the  
 8 competitive business strategies employed by Google’s app store competitors, for example by  
 9 influencing how those app stores market themselves to developers and how they distinguish  
 10 themselves from Google Play in the eyes of developers.

11           **199. Exhibit 18, Page -253 (far right column, between “Text” and “@divyachandra”;**  
 12 **between “osalva@google.com” and “+1 assuming they”; between “go consumption only” and**  
 13 **“@dmartinak”; between “dmartinak@google.com” and “I think the x-”; between**  
 14 **“aenewman@google.com” and “Helpful insight.”; between “your assessment” and “It’s already**  
 15 **contracted”; between “no matter what” and “Thanks both!”).** This text contains confidential, non-  
 16 public information regarding Google’s strategic thinking with respect to negotiating agreements with  
 17 developers. This information has never been disclosed publicly and the Google Play product team  
 18 treats it as strictly confidential. Disclosure of this non-public information is likely to result in  
 19 competitive harm to Google, as it reveals Google’s strategic decision-making which, for example,  
 20 could give a competitor or potential business partner unfair leverage in competing against or  
 21 negotiating with Google. Moreover, if publicly revealed, this information could influence the  
 22 competitive business strategies employed by Google’s app store competitors, for example by  
 23 influencing how those app stores market themselves to developers and how they distinguish  
 24 themselves from Google Play in the eyes of developers.

25           **200. Exhibit 18, Page -254 (entire page).** This text contains confidential, non-public  
 26 information regarding Google’s strategic thinking with respect to negotiating agreements with  
 27 developers, including Google’s confidential, internal assessments of how developers were expected to  
 28

1 respond to potential deals or programs. This information has never been disclosed publicly and the  
 2 Google Play product team treats it as strictly confidential. Disclosure of this non-public information is  
 3 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which,  
 4 for example, could give a competitor or potential business partner unfair leverage in competing against  
 5 or negotiating with Google. Moreover, if publicly revealed, this information could influence the  
 6 competitive business strategies employed by Google's app store competitors, for example by  
 7 influencing how those app stores market themselves to developers and how they distinguish  
 8 themselves from Google Play in the eyes of developers.

9 **201. Exhibit 18, Page -255 (text in the far right column of the table, between "Text" and**  
 10 **"Agreed. Are you"; between "one option)?" and "I recommend Option B").** This text contains  
 11 confidential, non-public information regarding Google's strategic thinking with respect to negotiating  
 12 agreements with developers. This information has never been disclosed publicly and the Google Play  
 13 product team treats it as strictly confidential. Disclosure of this non-public information is likely to  
 14 result in competitive harm to Google, as it reveals Google's strategic decision-making which, for  
 15 example, could give a competitor or potential business partner unfair leverage in competing against or  
 16 negotiating with Google. Moreover, if publicly revealed, this information could influence the  
 17 competitive business strategies employed by Google's app store competitors, for example by  
 18 influencing how those app stores market themselves to developers and how they distinguish  
 19 themselves from Google Play in the eyes of developers.

20 **202. Exhibit 18, Page -257 (entire slide and all text below slide).** This text contains  
 21 confidential, non-public information regarding Google's strategic thinking with respect to negotiating  
 22 agreements with developers, including Google's confidential, internal assessments of how developers  
 23 would react to potential deals or programs. This information has never been disclosed publicly and the  
 24 Google Play product team treats it as strictly confidential. Disclosure of this non-public information is  
 25 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which,  
 26 for example, could give a competitor or potential business partner unfair leverage in competing against  
 27 or negotiating with Google. Moreover, if publicly revealed, this information could influence the

1 competitive business strategies employed by Google's app store competitors, for example by  
2 influencing how those app stores market themselves to developers and how they distinguish  
3 themselves from Google Play in the eyes of developers.

4 **203. Exhibit 18, Page -259 (between "Responding to" and "Key business terms").** This  
5 text contains confidential, non-public information regarding Google's agreements with developers,  
6 including the identity of specific developers, deals, programs and/or offers. This information has never  
7 been disclosed publicly and the Google Play product team treats it as strictly confidential. Disclosure  
8 of this non-public information is likely to result in competitive harm to Google, as it reveals Google's  
9 strategic decision-making which, for example, could give a competitor or potential business partner  
10 unfair leverage in competing against or negotiating with Google. Moreover, if publicly revealed, this  
11 information could influence the competitive business strategies employed by Google's app store  
12 competitors, for example by influencing how those app stores market themselves to developers and  
13 how they distinguish themselves from Google Play in the eyes of developers.

14 **204. Exhibit 18, Page -261 (between "For discussion & alignment" and end of slide).**  
15 This text contains confidential, non-public information regarding Google's negotiations with  
16 developers, including specific deal terms that were contemplated or discussed, as well as Google's  
17 confidential, internal assessments of how developers would react to potential deals or programs. This  
18 information has never been disclosed publicly and the Google Play product team treats it as strictly  
19 confidential. Disclosure of this non-public information is likely to result in competitive harm to  
20 Google, as it reveals Google's strategic decision-making which, for example, could give a competitor  
21 or potential business partner unfair leverage in competing against or negotiating with Google.  
22 Moreover, if publicly revealed, this information could influence the competitive business strategies  
23 employed by Google's app store competitors, for example by influencing how those app stores market  
24 themselves to developers and how they distinguish themselves from Google Play in the eyes of  
25 developers.

26 **205. Exhibit 18, Page -262 (between "Proposed gameplan: Responding to Match" and**  
27 **end of slide).** This text contains confidential, non-public information regarding Google's negotiations

1 with developers, including specific deal terms that were contemplated or discussed, as well as  
 2 Google's confidential, internal assessments of how developers would react to potential deals or  
 3 programs. This information has never been disclosed publicly and the Google Play product team treats  
 4 it as strictly confidential. Disclosure of this non-public information is likely to result in competitive  
 5 harm to Google, as it reveals Google's strategic decision-making which, for example, could give a  
 6 competitor or potential business partner unfair leverage in competing against or negotiating with  
 7 Google. Moreover, if publicly revealed, this information could influence the competitive business  
 8 strategies employed by Google's app store competitors, for example by influencing how those app  
 9 stores market themselves to developers and how they distinguish themselves from Google Play in the  
 10 eyes of developers.

11 **206. Exhibit 18, Page -264 (entire slide).** This text contains confidential, non-public  
 12 information regarding Google's negotiations with developers, including specific deal terms that were  
 13 contemplated or discussed, as well as Google's confidential, internal assessments of how developers  
 14 would react to potential deals or programs. This information has never been disclosed publicly and the  
 15 Google Play product team treats it as strictly confidential. Disclosure of this non-public information is  
 16 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which,  
 17 for example, could give a competitor or potential business partner unfair leverage in competing against  
 18 or negotiating with Google. Moreover, if publicly revealed, this information could influence the  
 19 competitive business strategies employed by Google's app store competitors, for example by  
 20 influencing how those app stores market themselves to developers and how they distinguish  
 21 themselves from Google Play in the eyes of developers.

22 **207. Exhibit 18, Page -266 (all text below the header "Redline Details: Google Gives").**  
 23 This text contains confidential, non-public information regarding Google's negotiations with  
 24 developers, including specific deal terms that were contemplated or discussed, as well as Google's  
 25 confidential, internal assessments of how developers would react to potential deals or programs. This  
 26 information has never been disclosed publicly and the Google Play product team treats it as strictly  
 27 confidential. Disclosure of this non-public information is likely to result in competitive harm to  
 28



Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, if publicly revealed, this information could influence the competitive business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers.

**208. Exhibit 18, Page -267 (entire slide).** This text contains confidential, non-public information regarding Google's negotiations with developers, including specific deal terms that were contemplated or discussed, as well as Google's confidential, internal assessments of how developers would react to potential deals or programs. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, if publicly revealed, this information could influence the competitive business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers.

**209. Exhibit 18, Page -269 (entire slide).** This text contains confidential, non-public information regarding Google's negotiations with developers, including specific technical features that were requested or discussed, as well as Google's confidential, internal assessments of the demand for such features and Google's ability to implement such features. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, if publicly revealed, this information could influence the competitive business strategies employed by Google's app store

competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers.

**Google's Opposition to Match Plaintiffs' Motion for Partial Summary Judgment - Exhibit 20**

**[Dkt. No. 506-21]**

**(Exhibit B10)**

210. **Exhibit 20, Page -563 (entire table; between “deprioritized in September 2021 on” and end of page).** This information contains non-public and confidential data regarding potential product features being explored on Android and Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

211. **Exhibit 20, Page -564 (between beginning of page and “We'd prefer Match to wait for”; between “agreed to having the conversation):” and end of page).** This information contains non-public and confidential data regarding potential product features being explored on Android and Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

212. **Exhibit 20, Page -565 (between beginning of page and “Multiline subscriptions purchases or renewable”).** This information contains non-public and confidential data regarding potential product features being explored on Android and Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market

1 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
 2 U.S. developers.

3 **213. Exhibit 20, Page -567 (between “allow list that would enable the feature.” and**  
 4 **“July - Match Group suspended”).** This information contains non-public and confidential data  
 5 regarding potential product features being explored on Android and Google Play. This information has  
 6 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
 7 publicly revealed, this information could influence the competitive decision-making and business  
 8 strategies employed by Google’s app store competitors, for example by influencing how those app  
 9 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
 10 the eyes of U.S. developers.

11 **214. Exhibit 20, Page -568 (between “mainly Multiline for legacy SKUs subscriptions.”**  
 12 **and “Detailed Technical Requirements”; entire row between rows named “GPB Feature/Match**  
 13 **group app” and “Additional FOPs”).** This information contains non-public and confidential data  
 14 regarding potential product features being explored on Android and Google Play. This information has  
 15 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
 16 publicly revealed, this information could influence the competitive decision-making and business  
 17 strategies employed by Google’s app store competitors, for example by influencing how those app  
 18 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
 19 the eyes of U.S. developers.

20 **215. Exhibit 20, Page -569 (between “Available Solutions” and “2. Additional FOPs:**  
 21 **Google ran”).** This information contains non-public and confidential data regarding potential product  
 22 features being explored on Android and Google Play. This information has never been disclosed  
 23 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 24 information could influence the competitive decision-making and business strategies employed by  
 25 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 26 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.



1 been disclosed publicly. Disclosure of this information would adversely impact Google's current  
2 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
3 to attract developers away from Google.

4 **220. Exhibit 22, Page -122 (entire slide).** This information contains non-public information  
5 regarding Google's confidential non-public internal strategic considerations related to creating value  
6 for and attracting developers to the Google Play Store. This information has never been disclosed  
7 publicly. Disclosure of this information would adversely impact Google's current competitive position  
8 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
9 away from Google.

10 **221. Exhibit 22, Page -124 (between row named "Subscription bundles" and row named**  
11 **"One day prepaid plans").** This information contains non-public information regarding Google's  
12 confidential non-public internal strategic considerations related to creating value for and attracting  
13 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
14 this information would adversely impact Google's current competitive position by enabling Google's  
15 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

16 **222. Exhibit 22, Page -134 (between "2, 4, 8 Month Subscription Periods" and "One**  
17 **Day Pre-Paid Plans").** This information contains non-public information regarding Google's  
18 confidential non-public internal strategic considerations related to creating value for and attracting  
19 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
20 this information would adversely impact Google's current competitive position by enabling Google's  
21 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

22 **223. Exhibit 22, Page -136 (all text between top slide and "Match Requested Feature").**  
23 This information contains non-public information regarding Google's confidential non-public internal  
24 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
25 This information has never been disclosed publicly. Disclosure of this information would adversely  
26 impact Google's current competitive position by enabling Google's competitors to mimic its  
27 confidential strategies in an effort to attract developers away from Google.

**Google’s Motion for Partial Summary Judgment - Exhibit 1 [Dkt. No. 480-2]**  
**(Exhibit E2)**

**224. This Exhibit is duplicative of Exhibit 1 to Google’s Motion to Exclude Opinions Offered by Hal Singer (Dkt. No. 487-2) and Google’s sealing positions are reflected in Paragraphs 420 to 601 below.**

**Google’s Motion for Partial Summary Judgment - Exhibit 12 [Dkt. No. 480-13]**  
**(Exhibit C1)**

**225. Page 13, Line 28 (between “paid Riot” and “(GOOG-PLAY-000928690”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

**226. Page 14, Lines 15 to 16 (between “Supercell “up to” and “in cash incentives”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

**Google’s Motion for Partial Summary Judgment - Exhibit 13 [Dkt. No. 480-14]**  
**(Exhibit C2)**

**227. Page 15, Lines 17 to 19 (between “at various times,” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive

1 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
2 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
3 Google's competitors could use this non-party information to unfairly target Google's developer  
4 partners.

5 **228. Page 15, Note 1 (between "Herein," and "and all predecessors").** This text contains  
6 confidential, non-public information regarding non-party developers, and implicates the non-parties'  
7 confidentiality interests by purporting to reveal the nonparties' confidential statements made during  
8 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
9 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
10 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
11 Google's competitors could use this non-party information to unfairly target Google's developer  
12 partners.

13 **229. Page 21, Line 19 (between "paid Riot" and "(GOOG-PLAY-000928690)").** This text  
14 contains confidential, non-public information regarding Google's agreements with non-party  
15 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
16 as it reveals strategic decision-making which, for example, could give a competitor or potential  
17 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
18 competitors could use this non-party information to unfairly target Google's developer partners and  
19 offer specific deal terms designed to undercut those offered by Google.

20 **230. Page 22, Line 7 (between "up to" and "in cash incentives").** This text contains  
21 confidential, non-public information regarding Google's agreements with non-party developers.  
22 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
23 strategic decision-making which, for example, could give a competitor or potential business partner  
24 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
25 could use this non-party information to unfairly target Google's developer partners and offer specific  
26 deal terms designed to undercut those offered by Google.

27 **Google's Motion for Partial Summary Judgment - Exhibit 17 [Dkt. No. 480-18]**



## (Exhibit C3)

231. **Page -390 (Name in row following “Attention:”; text in rows following “Address, City, State, Postal Code, Country:”; text in rows following “Phone:”; text in rows following “Fax:”; text in row following “Email:”; first paragraph between “made by and between” and “for itself and”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

232. **Page -391, Paragraph 2.1 (between “application store (e.g.” and “on any Device”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

233. **Page -393, Paragraph 2.10.1 (between “deemed by” and “to be materially”; between “its notice provisions.” and “may terminate”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own

1 confidential statements made during negotiations. Further, disclosure of this non-public information is  
2 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
3 example, could give a competitor or potential business partner unfair leverage in competing against or  
4 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
5 unfairly target Google's developer partners.

6       234.     **Page -398, Paragraph 9.2 (between "A SERVICE, NOT GOODS." and "DOES**  
7 **NOT GUARANTEE")**. This text contains confidential, non-public information regarding non-party  
8 developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google  
9 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
10 will maintain the confidentiality of contractual terms and its own confidential statements made during  
11 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
12 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
13 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
14 Google's competitors could use this non-party information to unfairly target Google's developer  
15 partners.

16       235.     **Page -398, Paragraph 10.1 (between "NET GTV TO" and "FROM ANDROID**  
17 **MARKET")**. This text contains confidential, non-public information regarding non-party developers,  
18 and implicates the non-party's confidentiality interests, by revealing the identity of Google business  
19 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
20 maintain the confidentiality of contractual terms and its own confidential statements made during  
21 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
22 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
23 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
24 Google's competitors could use this non-party information to unfairly target Google's developer  
25 partners.

26       236.     **Page -399, Paragraph 11.2 (between "Market by Company ©" and "explicit**  
27 **direction")**. This text contains confidential, non-public information regarding non-party developers,  
28

and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

237. **Page -400 (signature block between "Company" and "Date").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment [Dkt. No. 509]**  
**(Exhibit D1)**

238. **Page 7, Line 28, Page 8, Lines 1-8 (between "Google offered Supercell "up to" and "in exchange for a written commitment not to launch content").** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

239. Page 22, Lines 14-19 (between “Match, Spotify” and “Epic Games”; between “Epic Games” and “and even”; between “and even” and “(Ex. 44”). This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 1**

**[Dkt. No. 509-2]**

**(Exhibit D2)**

240. Exhibit 1, Page 250, Line 7-8 (between “permission to send” and “in”; between “would grow to” and “in 2023;”). This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 2**

**[Dkt. No. 509-3]**

**(Exhibit D3)**

241. Exhibit 2, Page -892.R (contents of box between “CN OEMs share of GMS activations growing; but changes are lurking...” and “Google” in footer). This information contains non-public and confidential data regarding Google Play’s global outreach to OEMs and

1 partners. This information has never been disclosed publicly and the Google Play product team treats it  
2 as strictly confidential. If publicly revealed, this information could influence the competitive decision-  
3 making and business strategies employed by Google's app store competitors, for example by  
4 influencing how those app stores market themselves to U.S. developers and how they distinguish  
5 themselves from Google Play in the eyes of U.S. developers. Additionally, the disclosure of  
6 OEMs' highly confidential information would significantly harm OEMs' business. For example,  
7 OEMs' competitors could leverage this information to reap an unearned competitive advantage. They  
8 could exploit this information—that they otherwise would not have access to—to inform their own  
9 business strategies. To prevent these competitive harms from coming to fruition, OEMs proactively  
10 maintain the confidentiality of their strategic information, only disclosing it to a select group of  
11 individuals on an as-needed basis.

12 **242. Exhibit 2, Page -893.R (entire box above “Google” in footer).** This information  
13 contains non-public and confidential data regarding Google Play's global outreach to OEMs and  
14 partners. This information has never been disclosed publicly and the Google Play product team treats it  
15 as strictly confidential. If publicly revealed, this information could influence the competitive decision-  
16 making and business strategies employed by Google's app store competitors, for example by  
17 influencing how those app stores market themselves to U.S. developers and how they distinguish  
18 themselves from Google Play in the eyes of U.S. developers.

19 **243. Exhibit 2, Page -894.R (entire box above “Google” in footer).** This information  
20 contains non-public and confidential data regarding Google Play's global outreach to OEMs and  
21 partners. This information has never been disclosed publicly and the Google Play product team treats it  
22 as strictly confidential. If publicly revealed, this information could influence the competitive decision-  
23 making and business strategies employed by Google's app store competitors, for example by  
24 influencing how those app stores market themselves to U.S. developers and how they distinguish  
25 themselves from Google Play in the eyes of U.S. developers. Additionally, the disclosure of  
26 OEMs' highly confidential information would significantly harm OEMs' business. For example,  
27 OEMs' competitors could leverage this information to reap an unearned competitive advantage. They

could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, OEMs proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis.

**244. Exhibit 2, Page -895.R (contents of box between “Android share in select markets - OEM Portfolio balance a concern” and “Google” in footer).** This information contains non-public and confidential data regarding Google Play’s global outreach to OEMs and partners. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. Additionally, the disclosure of OEMs'highly confidential information would significantly harm OEMS' business. For example, OEMS' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, OEMs proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis.

**245. Exhibit 2, Page -899.R (entire box above “Google” in footer).** This information contains non-public and confidential data regarding Google Play’s global outreach to OEMs and partners. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment- Exhibit 4**

**[Dkt. No. 509-5]**

**(Exhibit D4)**

246. **Exhibit 4, Page -840 (between “tl;dr:” and end of the sentence; entire paragraph between “that happened in early April last year.” and “At this time, we didn't ask for contractual commitments”; middle of page between “At this time, we didn't ask for contractual commitments” and “the focus was getting Riot”; between “with Riot by asking them to commit to the” and end of paragraph).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This information contains non-public and confidential data regarding Google’s outreach to game developers on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. Additionally, the disclosure of the developer's highly confidential information would significantly harm the developer's business. For example, developer's competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developer proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

247. **Exhibit 4, Page -842 (top of page between “that we were able to get aligned on are:” and “Andreas has been doing a great job”; middle of the page sentence between “they are committing for their new games.” and “We have additional regional details”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during



1 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
2 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
3 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
4 Google's competitors could use this non-party information to unfairly target Google's developer  
5 partners. Additionally, the disclosure of the developer's highly confidential information would  
6 significantly harm the developer's business. For example, developer's competitors could leverage this  
7 information to reap an unearned competitive advantage. They could exploit this information—that they  
8 otherwise would not have access to—to inform their own business strategies. To prevent these  
9 competitive harms from coming to fruition, developer proactively maintains the confidentiality of its  
10 strategic information, only disclosing it to a select group of individuals on an as-needed basis.

11 **248. Exhibit 4, Page -842 (bottom of page between “As part of this initial proposal, it**  
12 **will include” and end of sentence; between “Riot asked that we roll-up the” and “with our**  
13 **proposal so that the Riot team”).** This text contains confidential, non-public information regarding  
14 non-party developers, and implicates the non-parties' confidentiality interests by purporting to reveal  
15 the nonparties' confidential statements made during negotiations. Further, disclosure of this non-public  
16 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
17 which, for example, could give a competitor or potential business partner unfair leverage in competing  
18 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
19 information to unfairly target Google's developer partners. Additionally, the disclosure of the  
20 developer's highly confidential information would significantly harm the developer's business. For  
21 example, developer's competitors could leverage this information to reap an unearned competitive  
22 advantage. They could exploit this information—that they otherwise would not have access to—to  
23 inform their own business strategies. To prevent these competitive harms from coming to fruition,  
24 developer proactively maintains the confidentiality of its strategic information, only disclosing it to a  
25 select group of individuals on an as-needed basis.

26 **Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment - Exhibit 5**

27 **[Dkt. No. 509-6]**

**(Exhibit D5)**

249. **Exhibit 5, Page 269, Line 3-4 (between “Number 3 is” and “sounds fuzzy”) Line 5 (between “approximate” and “the right market price for”), and Line 22 (between “both agree that the” and “is”).** This text contains confidential, non-public information regarding financial and other deal terms contained in Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

250. **Exhibit 5, Page 270, Line 5 (between “terms of the” and “of”) and Line 8 (between beginning of line and “is that correct?”).** This text contains confidential, non-public information regarding financial and other deal terms contained in Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

251. **Exhibit 5, Page 270, Line 11 (between “communicating to” and “some of”).** This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party’s confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

252. **Exhibit 5, Page 270, Line 16 (from “around the” to end of sentence) and Line 18 (between “vis-a-vis the” and “aspect”).** This text contains confidential, non-public information regarding deal terms contained in Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic

1 decision-making which, for example, could give a competitor or potential business partner unfair  
 2 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
 3 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
 4 designed to undercut those offered by Google.

5 **253. Exhibit 5, Page 271, Line 16 (between "update on the" and end of sentence.), and**  
 6 **Line 21 (between "spoken to" and "and had").** This text contains confidential, non-public  
 7 information regarding a non-party developer, and implicates the non-party's confidentiality interests,  
 8 by revealing the identity of a Google business partner who is not party to this litigation, and who have  
 9 a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 10 confidential statements made during negotiations.

11 **254. Exhibit 5, Page 272, Line 4 (between "meaning" and "not liking Google's"); and**  
 12 **Line 21 (between "And" and "rejected").** This text contains confidential, non-public information  
 13 regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing  
 14 the identity of a Google business partner who is not party to this litigation, and who have a reasonable  
 15 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 16 statements made during negotiations.

17 **255. Exhibit 5, Page 272, Lines 5-6 (entire lines), Line 13 (from "of" to end of sentence),**  
 18 **Line 17 (between "into" and "we all"), and Lines 18-19 (between "make a" and end of sentence).**  
 19 This text contains confidential, non-public information regarding Google's agreements with non-party  
 20 developers, including specific confidential deal terms and related negotiations. Disclosure of this non-  
 21 public information is likely to result in competitive harm to Google, as it reveals strategic decision-  
 22 making which, for example, could give a competitor or potential business partner unfair leverage in  
 23 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
 24 party information to unfairly target Google's developer partners and offer specific deal terms designed  
 25 to undercut those offered by Google.

26 **256. Exhibit 5, Page 273, Line 3 (between "is a reference to" and end of line) and Line**  
 27 **24 (between "basically" and "was saying").** This text contains confidential, non-public information  
 28

1 regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing  
 2 the identity of a Google business partner who is not party to this litigation, and who have a reasonable  
 3 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 4 statements made during negotiations.

5 **257. Exhibit 5, Page 273, Lines 4-6 (from "there be a" to end of Line 6), Line 10 (from**  
 6 **"removing" to end of sentence"), Lines 17-20 (between "distribution platform" and "[As read]"),**  
 7 **and Line 25 (between "backed out of" and "they may") .** This text contains confidential, non-public  
 8 information regarding purported statements made by a non-party developer, and implicates the non-  
 9 party's confidentiality interests, who has a reasonable expectation that Google will maintain the  
 10 confidentiality of contractual terms and its own confidential statements made during negotiations. It  
 11 also contains confidential information regarding Google's confidential negotiations with a non-party  
 12 developer. Disclosure of this non-public information is likely to result in competitive harm to Google,  
 13 as it reveals strategic decision-making which, for example, could give a competitor or potential  
 14 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 15 competitors could use this non-party information to unfairly target Google's developer partners and  
 16 offer specific deal terms designed to undercut those offered by Google.

17 **258. Exhibit 5, Page 283, Lines 19-21 (in entirety) and Lines 24-25 (from "negotiations,**  
 18 **had" to end of sentence).** This text contains confidential, non-public information regarding Google's  
 19 agreements with non-party developers, including specific confidential deal terms and related  
 20 negotiations. Disclosure of this non-public information is likely to result in competitive harm to  
 21 Google, as it reveals strategic decision-making which, for example, could give a competitor or  
 22 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 23 Google's competitors could use this non-party information to unfairly target Google's developer  
 24 partners and offer specific deal terms designed to undercut those offered by Google.

25 **259. Exhibit 5, Page 284, Lines 3-5 (in entirety), Lines 10-13 (in entirety), Line 14**  
 26 **(between "And the" and "is the"), and Line 19 (between "a" and "but").** This text contains  
 27 confidential, non-public information regarding Google's agreements with non-party developers,  
 28

including specific confidential deal terms and related negotiations. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

**Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment - Exhibit 6**

**[Dkt. No. 509-7]**

**(Exhibit D6)**

260. **Exhibit 6, Page -690.R (between "GVP 1.0 Impact Assessment" and "GVP 1.0 x-Google Financial Assessment").** This text contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

261. **Exhibit 6, Page -694.R (text in row under "GVP 1.0 Target Developers:" and to the left of "Drive disproportionate value to Google"; text in row to the left of "Beacons of the ecosystem"; text in row to the left of "Expressed discontent over lack of unified support from Google"; text in row to the left of "May forgo Play (& Android)" and above "Full Partner List").** This text contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store, including the identity of specific, strategic non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1           **262. Exhibit 6, Page -695.R (between “Non Goals: Play exclusivity, drive additional**  
 2 **xPA integrations (eg:” and “xPA spend commitments”).** This text contains non-public information  
 3 regarding Google’s confidential non-public internal strategic considerations related to creating value  
 4 for and attracting developers to the Google Play Store, including discussion of potential deal terms.  
 5 This information has never been disclosed publicly. Disclosure of this information would adversely  
 6 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 7 confidential strategies in an effort to attract developers away from Google.

8           **263. Exhibit 6, Page -697.R (Under leftmost column “1) Prioritize Play”, entire first**  
 9 **bullet, second bullet between “of titles” and “on Play”, entire third bullet and entire fourth**  
 10 **bullet; under middle column “2) Boost X-PA Product Adoption”, both highlighted dollar terms**  
 11 **in second bullet and highlighted dollar term in third bullet; and in rightmost column “3)**  
 12 **Improve Sentiment”, between “to date” and “devs”).** This text reflects Google's non-public,  
 13 competitively sensitive and current internal information, including information as to its commercial  
 14 dealings, negotiations, financial terms, and strategy with respect to counterparties, including the  
 15 identities of certain of those counterparties. Public disclosure could cause harm to Google's  
 16 competitive standing by giving competitors and others insights into Google's business strategies.

17           **264. Exhibit 6, Page -698.R (between “GOAL 1: Prioritize Play Users” and “target)**  
 18 **devs representing”; between “target) devs representing” and “of total Play spend signed GVP,”**  
 19 **column below “2019 Play A&G Spend”; entire contents of column below “100% of titles**  
 20 **simshipped (184 titles)” and “Holding Out”; in box beneath “Holding Out”; from beginning of**  
 21 **footer and “signing up to GVP obligations”).** This text reflects Google's non-public, competitively  
 22 sensitive and current internal information, including information as to its commercial dealings,  
 23 negotiations, financial terms, and strategy with respect to counterparties, including the identities of  
 24 certain of those counterparties. Public disclosure could cause harm to Google's competitive standing by  
 25 giving competitors and others insights into Google's business strategies.

26           **265. Exhibit 6, Page -699.R, BC Success Metrics column (between “ARR acceleration”**  
 27 **and “2024)””; between “2024)” and (by 2024)””; between “Win-Rate acceleration” and end of row;**

1 between “N/A” and end of row; between “UAC yoy growth rate acceleration” and end of row;  
 2 between “SVA/Best Practice adoption” and end of row; between “Mobile game watchtime, as %  
 3 of total gaming watchtime” and “(by 2022)”; between “(by 2022)” and “(2020)”; between “N/A”  
 4 and end of row; between “upload uplift N/A” and end of row). This information reflects specific,  
 5 confidential details and terms about specific programs offered by Google as well as the specific deal  
 6 terms and values offered to particular partners. This information is confidential and could give other  
 7 developers an advantage over Google in negotiations. Disclosure of this information could harm  
 8 Google's relationship with its partners and any ongoing negotiations or dealings with them. The  
 9 information also implicates non-party confidentiality interests, by revealing the identities of Google's  
 10 business partners, who are not party to this litigation, and who have a reasonable expectation that  
 11 Google will maintain the confidentiality of contractual terms. Public disclosure of these specific  
 12 programs and deal terms could give Google's competitors and developer partners an unfair advantage  
 13 over Google in negotiations. Moreover, the text reveals Google's internal strategic financial  
 14 considerations underlying these non-public deals and deal terms. Public disclosure of this information  
 15 is likely to result in competitive harm to Google.

16 **266. Exhibit 6, Page -699.R, Other Metrics column (between “Spend Commits” and end**  
 17 **of row; between “Share of Wallet” and end of row; between “ROI” and end of row).** This  
 18 information reflects specific, confidential details and terms about specific programs offered by Google  
 19 as well as the specific deal terms and values offered to particular partners. This information is  
 20 confidential and could give other developers an advantage over Google in negotiations. Disclosure of  
 21 this information could harm Google's relationship with its partners and any ongoing negotiations or  
 22 dealings with them. The information also implicates non-party confidentiality interests, by revealing  
 23 the identities of Google's business partners, who are not party to this litigation, and who have a  
 24 reasonable expectation that Google will maintain the confidentiality of contractual terms. Public  
 25 disclosure of these specific programs and deal terms could give Google's competitors and developer  
 26 partners an unfair advantage over Google in negotiations. Moreover, the text reveals Google's internal



1 strategic financial considerations underlying these non-public deals and deal terms. Public disclosure  
2 of this information is likely to result in competitive harm to Google.

3 **267. Exhibit 6, Page -699.R, (between “Cloud Deals” and end of paragraph; between**  
4 **“TOTAL” and “Incremental”; between “Incremental: and “M”; between “BC 5-year total:” and**  
5 **“HUG BC 5-year total:” and “and HUG new projected”; between “5-year total:” and “Win-rate**  
6 **acceleration:”; between “BC conversion was” and “w/o HUG and”; between “w/o HUG and”**  
7 **and “with HUG” and “=”; between “=” and end of sentence; between 12 out of 18 developers**  
8 **so” and “conversion.”; between “Estimating conservatively at” and “through program**  
9 **duration.”; between “through program duration.” and end of line; between “9 titles include”**  
10 **and “migrating from”; from “migrating from” and “-Expected to 13x spending”).** This  
11 information reflects specific, confidential details and terms about specific programs offered by Google  
12 as well as the specific deal terms and values offered to particular partners. This information is  
13 confidential and could give other developers an advantage over Google in negotiations. Disclosure of  
14 this information could harm Google's relationship with its partners and any ongoing negotiations or  
15 dealings with them. The information also implicates non-party confidentiality interests, by revealing  
16 the identities of Google's business partners, who are not party to this litigation, and who have a  
17 reasonable expectation that Google will maintain the confidentiality of contractual terms. Public  
18 disclosure of these specific programs and deal terms could give Google's competitors and developer  
19 partners an unfair advantage over Google in negotiations. Moreover, the text reveals Google's internal  
20 strategic financial considerations underlying these non-public deals and deal terms. Public disclosure  
21 of this information is likely to result in competitive harm to Google.

22 **268. Exhibit 6, Page -700.R, (between beginning of first line and “- new customer”;**  
23 **between beginning of second line “and new title”; between beginning of third line and “-**  
24 **Expected to 40x spending).** This text contains confidential, non-public information regarding non-  
25 party developers, and implicates non-parties' confidentiality interests, by revealing the identities of  
26 Google's business partners, who are not parties to this litigation, and who have a reasonable  
27 expectation that Google will maintain the confidentiality of contractual terms. Further, disclosure of  
28

1 this non-public information is likely to result in competitive harm to Google as, for example, Google's  
2 competitors could use this non-party information to unfairly target Google's developer partners and  
3 offer deal terms specifically designed to undercut those offered by Google.

4 **269. Exhibit 6, Page -701.R (entire table and footers).** This text contains confidential,  
5 non-public information regarding non-party developers, and implicates non-parties' confidentiality  
6 interests, by revealing the identities of Google's business partners, who are not parties to this litigation,  
7 and who have a reasonable expectation that Google will maintain the confidentiality of contractual  
8 terms. Further, disclosure of this non-public information is likely to result in competitive harm to  
9 Google as, for example, Google's competitors could use this non-party information to unfairly target  
10 Google's developer partners and offer deal terms specifically designed to undercut those offered by  
11 Google.

12 **270. Exhibit 6, Page -702.R (left column of table; between “Outside of” and “singularly**  
13 **focused”).** This text contains confidential, non-public information regarding non-party developers, and  
14 implicates non-parties' confidentiality interests, by revealing the identities of Google's business  
15 partners, who are not parties to this litigation, and who have a reasonable expectation that Google will  
16 maintain the confidentiality of contractual terms. Further, disclosure of this non-public information is  
17 likely to result in competitive harm to Google as, for example, Google's competitors could use this  
18 non-party information to unfairly target Google's developer partners and offer deal terms specifically  
19 designed to undercut those offered by Google.

20 **271. Exhibit 6, Page -703.R (left column of table; between “Strategic partnership with”**  
21 **and end of line).** This text contains confidential, non-public information regarding non-party  
22 developers, and implicates non-parties' confidentiality interests, by revealing the identities of Google's  
23 business partners, who are not parties to this litigation, and who have a reasonable expectation that  
24 Google will maintain the confidentiality of contractual terms. Further, disclosure of this non-public  
25 information is likely to result in competitive harm to Google as, for example, Google's competitors  
26 could use this non-party information to unfairly target Google's developer partners and offer deal terms  
27 specifically designed to undercut those offered by Google.

1           **272. Exhibit 6, Page -705 (between “positive contribution of” and end of line”; columns**  
 2 **under “2019,” “2020,” “2021,” “2022,” “2019-2022”; between start of line and “incr. rev (from**  
 3 **large”; between “endweighted, with” and “of ABK”; between “of ABK” and “package hitting**  
 4 **2020”; between “GVP at” and “reinvestment continues”).** This information reflects and is  
 5 calculated from internal, non-public Google financial data. Google spends significant resources  
 6 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
 7 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 8 by giving competitors insight into confidential Google financial information. Further, this information  
 9 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
 10 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
 11 advantage against Google.

12           **273. Exhibit 6, Page -706 (entire chart).** This information reflects and is calculated from  
 13 internal, non-public Google financial data. Google spends significant resources compiling and  
 14 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
 15 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 16 competitors insight into confidential Google financial information. Further, this information reflects  
 17 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
 18 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 19 against Google.

20           **274. Exhibit 6, Page -707 (between “even without” and “Play risk”; entire chart; “even**  
 21 **without” and “Play risk mitigation”; between “investments of” and “over 2019-2024”; between**  
 22 **“to recoup” and “of invested value”; between “invested value” and “expected to sign**  
 23 **incremental”; between “commits” and “and turn ROI”; between “+ve” and “esports**  
 24 **investment”; between “investment with” and “adversely impacted”; between “adversely**  
 25 **impacted” and “and program”; between “3 years for” and “UAC margin”; between “2019, and”**  
 26 **and “thereafter”; between “to Cloud of” and “toward Cloud credits”; between “worth” and “by**  
 27 **2022”).** This information reflects and is calculated from internal, non-public Google financial data.  
 28

Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**275. Exhibit 6, Page -710 (between “selection – An” and “for game developers”; all text in the slide below “New to Play PC/Console Devs” and “On Play “enterprise” Developers”; all text below slide besides “Both” and “meet the criteria”).** This text contains confidential, non-public information regarding non-party developers, and implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners, who are not parties to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms. Further, disclosure of this non-public information is likely to result in competitive harm to Google as, for example, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer deal terms specifically designed to undercut those offered by Google.

**276. Exhibit 6, Page -711 (last column for rows “Build & Test”, “Launch”, “UA”, and “Community”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**277. Exhibit 6, Page -712 (all text in box beginning with “Google Gives”; all text in box beginning with “Google Gets (contractual)”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position

by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**278. Exhibit 6, Page -713 (between "GVP 2021" and "Play Margin"; entire table; between beginning of sentence and "to extend commercial"; between "1.0 devs @" and "of respective"; between beginning of sentence and "to 11 new developers"; between beginning of sentence and "GVP 2.0 developers"; between beginning of sentence and "GVP 2.0 developers"; between "1 Excludes" and "who already have"; between "already getting" and "of Play spend").** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**279. Exhibit 6, Page -715 (both figures; between "offered at" and "& met the following"; between "footprint;" and "incremental Google margin"; between "against investment of" and end of sentence; between "reduced rev share" and "Runway may help address").** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**280. Exhibit 6, Page -716 (text below "Google Gives" and "Google Gets" and above "Eligibility criteria: expand").** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to

1 result in competitive harm to Google, as it reveals strategic decision-making which, for example, could  
 2 give a competitor or potential business partner unfair leverage in competing against or negotiating with  
 3 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 4 Google's developer partners and offer specific deal terms designed to undercut those offered by  
 5 Google.

6 **281. Exhibit 6, Page -718 (all text in columns under "Runway"; "GVP"; "GVP (in**  
 7 **conjunction w/Runway").** This information contains non-public information regarding Google's  
 8 confidential non-public internal strategic considerations related to creating value for and attracting  
 9 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
 10 this information would adversely impact Google's current competitive position by enabling Google's  
 11 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

12 **282. Exhibit 6, Page -719 (all text in columns under "Option 1", "Option 2", and**  
 13 **"Option 3").** This information contains non-public information regarding Google's confidential non-  
 14 public internal strategic considerations related to creating value for and attracting developers to the  
 15 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
 16 would adversely impact Google's current competitive position by enabling Google's competitors to  
 17 mimic its confidential strategies in an effort to attract developers away from Google.

18 **283. Exhibit 6, Page -721 (all text in slide below "address gaps & focus on joint**  
 19 **growth").** This information contains non-public information regarding Google's confidential non-  
 20 public internal strategic considerations related to creating value for and attracting developers to the  
 21 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
 22 would adversely impact Google's current competitive position by enabling Google's competitors to  
 23 mimic its confidential strategies in an effort to attract developers away from Google.

24 **284. Exhibit 6, Page -722 (between "Lifetime Revenue of IP" and end of line under**  
 25 **"GVP 1.0"; between "Lifetime Revenue of IP" and end of line under "GVP 1.0"; between**  
 26 **"Lifetime Spend" and "OR"; between "Lifetime spend =" and "growing"; between "growing"**  
 27 **and "OR"; between "Lifetime Spend" and "and growing"; between "and growing" and "YoY";**  
 28

between “Lifetime Spend =” and “growing”; between “growing” and end of the line; entire rows beginning in “# of developers”, “% of Play Spend covered”, “Google Gets”, and “Term”; between “Ad credits:” and “of eligible UAC spend”; between GCP credits” and “of Play Consumer Spend”; between “GCP credits” and “of Play Spend”; between “% investment” and “of respective Play”; between “Play consumer spend” and “of respective Play Consumer Spend”). This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**285. Exhibit 6, Page -725 (between “cost by” and “mainly due to”; all figures in the table).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**286. Exhibit 6, Page -726 (text to the right of “Ads Credits”; text to the right of “GCP Credits”; text to the right of “Comarketing”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**287. Exhibit 6, Page -728 (between “bundle with” and “offers the best”; four developer icons below “3 month trial”; icon to the right of “Android Premium Phone or Plan Purchase”;**



1 **between start of bullet point and “marketing investment in ATL”; between start of bullet point**  
 2 **and “marketing investment match”).** This text contains confidential, non-public information  
 3 regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing  
 4 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
 5 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 6 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 7 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 8 could give a competitor or potential business partner unfair leverage in competing against or  
 9 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 10 unfairly target Google’s developer partners.

11 **288. Exhibit 6, Page -729 (icon to the right of “Android Premium Phone or Plan**  
 12 **Purchase”; three developer icons below “Youtube Premium Free 3 month Trial”; all text in box**  
 13 **called “Interactive sharers”; three icons to the left of “Free! 3P content offers (TBD)”; between**  
 14 **“the world of” and “interact with”).** This text contains confidential, non-public information  
 15 regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing  
 16 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
 17 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 18 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 19 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 20 could give a competitor or potential business partner unfair leverage in competing against or  
 21 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 22 unfairly target Google’s developer partners.

23 **289. Exhibit 6, Page -730 (between start of sentence and “year Spend commits”; second**  
 24 **row in column named “Projected”; all information in column named “Actual”; between start of**  
 25 **bullet point and “receiving GCP credits”; between “deals with” and “of the top”; between “of**  
 26 **the top” and “developers collectively”; between “to spend” and “on IT in 2021”; all text below**  
 27 **slide).** This text contains confidential, non-public information regarding non-party developers, and  
 28

implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This information also contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**290. Exhibit 6, Page -731 (all text following "incremental attributable to Hug").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. This information also contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

**291. Exhibit 6, Page -732 (entire chart; between start of bullet point and "developers expected to deliver"; between "to deliver" and "in IT spend in 2021"; between "a deal with" and "developers"; between "GCP (up to" and "due to"; between "reside on GCP" and "uplift from standard"; between "discounts," and "uplift from HUG").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and

1 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
 2 and its own confidential statements made during negotiations. This information also contains non-  
 3 public information regarding Google's confidential non-public internal strategic considerations related  
 4 to creating value for and attracting developers to the Google Play Store. Further, disclosure of this non-  
 5 public information is likely to result in competitive harm to Google, as it reveals strategic decision-  
 6 making, which, for example, could give a competitor or potential business partner unfair leverage in  
 7 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
 8 party information to unfairly target Google's developer partners.

9 **292. Exhibit 6, Page -733 (first row in column beginning with "Projected"; all**  
 10 **information in column beginning with "Actual").** This information contains non-public information  
 11 regarding Google's confidential non-public internal strategic considerations related to creating value  
 12 for and attracting developers to the Google Play Store. This information has never been disclosed  
 13 publicly. Disclosure of this information would adversely impact Google's current competitive position  
 14 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
 15 away from Google.

16 **293. Exhibit 6, Page -734 (all information in column beginning with "Actual"; between**  
 17 **start of bullet point and "receiving UAC credits as"; between "Hug with" and "in credits**  
 18 **received"; between "revenue uplift of" and "(which exceeds BC"; between "negative ROI of"**  
 19 **and "through exceeded BC"; between "was equivalent to" and "of released credits"; between "of**  
 20 **released credits" and "actual uplift range"; between "range of" and "based on analysis").** This  
 21 information contains non-public information regarding Google's confidential non-public internal  
 22 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 23 This information has never been disclosed publicly. Disclosure of this information would adversely  
 24 impact Google's current competitive position by enabling Google's competitors to mimic its  
 25 confidential strategies in an effort to attract developers away from Google.

26 **294. Exhibit 6, Page -735 (between "post-Hug indicates" and "(mainly"; between**  
 27 **"(mainly" and end of line; between "continue to see an" and "across most clients"; between**

1 **“indicates aggregate” and “which exceeds BC”; entire table; between “incrementality study”**  
 2 **and “is attributable to Hug”; between “with the remaining” and “due to other factors”; between**  
 3 **“Note:” and “has been removed”; between “removed from all” and “metrics, as they”; between**  
 4 **“(new” and “deal effective”; between “Apr-20)” and “Hug treatment period is 12”; between**  
 5 **“whereas” and “treatment period is only 3”; between “Consolidated” and “accounts for”;**  
 6 **between “accounts for” and “of credits earned”; between “earned, and” and “of total uplift”).**

7 This text contains confidential, non-public information regarding non-party developers, and implicates  
 8 the non-party’s confidentiality interests, by revealing the identity of Google business partners who are  
 9 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
 10 confidentiality of contractual terms and its own confidential statements made during negotiations. This  
 11 information also contains non-public information regarding Google’s confidential non-public internal  
 12 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 13 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 14 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 15 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 16 competitors could use this non-party information to unfairly target Google’s developer partners.

17 **295. Exhibit 6, Page -736 (between “increased from” and “based on the refreshed”;**  
 18 **entire tables; between “Jun-20 was” and “of total UAC spend”; between “Hug was” and “on QS-**  
 19 **only). This information reflects and is calculated from internal, non-public Google financial data.**  
 20 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
 21 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
 22 cause Google competitive harm by giving competitors insight into confidential Google financial  
 23 information. Further, this information reflects sensitive, highly confidential characterizations by  
 24 Google's internal business teams that, if revealed, could be referenced by potential counterparties in  
 25 negotiations with Google to gain an unfair advantage against Google.

26 **296. Exhibit 6, Page -737 (between “deals live;” and “earned to date”; between “earned**  
 27 **to date” and end of sentence”; entire table; between “New” and “deal went live”; between**

1 “4/1/20. All” and “revenue from”; between “revenue from” and “included in”; between  
 2 “included in the” and “line, as they have”; between “Nov-19” and “is active 8 months”; between  
 3 “Note:” and “has been removed”; between “removed from all” and “metrics, as they”; between  
 4 “(new” and “deal effective”; between “Apr-20)” and “Hug treatment period is 12”; between  
 5 “whereas” and “treatment period is only 3”). This information reflects and is calculated from  
 6 internal, non-public Google financial data. Google spends significant resources compiling and  
 7 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
 8 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 9 competitors insight into confidential Google financial information. Further, this information reflects  
 10 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
 11 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 12 against Google.

13 **297. Exhibit 6, Page -738 (all text following “major game developers”).** This text  
 14 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 15 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 16 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 17 of contractual terms and its own confidential statements made during negotiations. Further, disclosure  
 18 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 19 decision-making, which, for example, could give a competitor or potential business partner unfair  
 20 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 21 this non-party information to unfairly target Google’s developer partners.

22 **298. Exhibit 6, Page -739 (all icons below “Signed up to Hug – Contract Executed”).**  
 23 This text contains confidential, non-public information regarding non-party developers, and implicates  
 24 the non-party’s confidentiality interests, by revealing the identity of Google business partners who are  
 25 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
 26 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 27 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 28

1 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 2 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 3 competitors could use this non-party information to unfairly target Google's developer partners.

4 **299. Exhibit 6, Page -740 (between "Other devs (e.g." and "who previously"; between**  
 5 **"cautious developers like" and "Play's PC").** This text contains confidential, non-public  
 6 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
 7 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 8 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 9 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 10 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 11 example, could give a competitor or potential business partner unfair leverage in competing against or  
 12 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
 13 unfairly target Google's developer partners.

14 **300. Exhibit 6, Page -741 (all text in boxes).** This information contains non-public  
 15 information regarding Google's confidential non-public internal strategic considerations related to  
 16 creating value for and attracting developers to the Google Play Store. This information has never been  
 17 disclosed publicly. Disclosure of this information would adversely impact Google's current  
 18 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
 19 to attract developers away from Google.

20 **301. Exhibit 6, Page -743 (all text in rows beginning in "Google Gets" and "Google**  
 21 **Gives").** This information contains non-public information regarding Google's confidential non-  
 22 public internal strategic considerations related to creating value for and attracting developers to the  
 23 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
 24 would adversely impact Google's current competitive position by enabling Google's competitors to  
 25 mimic its confidential strategies in an effort to attract developers away from Google.

26 **302. Exhibit 6, Page -744 (between "DevRel Consultants" and end of column; between**  
 27 **"YT Influencers" and end of column; between "UAC credits" and end of column; between "YT**

**channel growth” and end of column).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**303. Exhibit 6, Page -745 (all text in rows beginning with “Eligibility criteria”, “Google Gives”, “Google Gets”, and “Play % reinvested”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**304. Exhibit 6, Page -746 (between “even without” and “Play risk mitigation”; between “outsized” and “investments diluted”; entire chart; between “Program is ROI positive even without” and “Play risk mitigation”; between “investments of” and “(over 2019”; between “to recoupe” and “of value”; between “reflected in ROI” and “expected to sign”; between “GCP commits” and “and turn”; between “and turn” and “esports investment”; between “investment with” and “adversely impacted”; between “adversely impacted” and “and program”; between “for most devs” and “of UAC margin” between “2019, and” and “thereafter”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair



1 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
2 this non-party information to unfairly target Google's developer partners.

3       **305. Exhibit 6, Page -753 (columns below "Deal structure option 1", "Deal structure**  
4 **option 2" and "Deal structure option 3").** This information contains non-public information  
5 regarding Google's confidential non-public internal strategic considerations related to creating value  
6 for and attracting developers to the Google Play Store. This information has never been disclosed  
7 publicly. Disclosure of this information would adversely impact Google's current competitive position  
8 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
9 away from Google.

10       **306. Exhibit 6, Page -754 (columns below "Deal structure option 1", "Deal structure**  
11 **option 2" and "Deal structure option 3").** This information contains non-public information  
12 regarding Google's confidential non-public internal strategic considerations related to creating value  
13 for and attracting developers to the Google Play Store. This information has never been disclosed  
14 publicly. Disclosure of this information would adversely impact Google's current competitive position  
15 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
16 away from Google.

17       **307. Exhibit 6, Page -757 (between "was calculated as" and "but has been"; between**  
18 **"revised to" and "(breakeven"; between "defined at" and "in credits").** This information contains  
19 non-public information regarding Google's confidential non-public internal strategic considerations  
20 related to creating value for and attracting developers to the Google Play Store. This information has  
21 never been disclosed publicly. Disclosure of this information would adversely impact Google's current  
22 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
23 to attract developers away from Google.

24       **Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment- Exhibit 8**

25                               **[Dkt. No. 509-9]**

26                               **(Exhibit D7)**

1           **308. Exhibit 8, Page 226 (top of page between “further states that” and end of**  
 2 **paragraph).** This text contains non-public and confidential information regarding the Games Velocity  
 3 Program, including specific deal terms. This information has never been disclosed publicly and the  
 4 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
 5 influence the competitive decision-making and business strategies employed by Google’s app store  
 6 competitors, for example by influencing how those app stores market themselves to U.S. developers  
 7 and how they distinguish themselves from Google Play in the eyes of U.S. developers.

8           **309. Exhibit 8, Page 226 paragraph 441 (between “about developers as follows:” and**  
 9 **end of paragraph).** This text contains non-public and sensitive information reflecting Google’s  
 10 internal, confidential analyses of developers’ ability to distribute apps outside of Google Play. This  
 11 information has never been disclosed publicly and the Google Play product team treats it as strictly  
 12 confidential. If publicly revealed, this information could influence the competitive decision-making  
 13 and business strategies employed by Google’s app store competitors, for example by influencing how  
 14 those app stores market themselves to developers and how they distinguish themselves from Google  
 15 Play in the eyes of developers. Further, disclosure of this non-public information is likely to result in  
 16 competitive harm to Google, as it reveals Google’s strategic decision-making which, for example,  
 17 could give a competitor or potential business partner unfair leverage in competing against or  
 18 negotiating with Google.

19           **310. Exhibit 8, Page 226 paragraph 442 (between ““target developers”:” and end of**  
 20 **paragraph).** This text contains confidential, non-public information regarding Google’s agreements  
 21 and partnerships with non-party developers, including Google’s strategic considerations in identifying  
 22 potential partners. Disclosure of this non-public information is likely to result in competitive harm to  
 23 Google, as it reveals Google’s strategic decision-making which, for example, could give a competitor  
 24 or potential business partner unfair leverage in competing against or negotiating with Google.  
 25 Moreover, Google’s competitors could use this non-party information to unfairly target Google's  
 26 developer partners and offer specific deal terms designed to undercut those offered by Google.



1           **313. Exhibit 23, Page 207, Paragraph 375 (between “because only” and “of**  
 2 **downloads”;** **between “in 2021, just” and “of U.S. consumer”).** This text reflects the portion of  
 3 downloads and consumer spend from paid apps on Google Play from August 2019 to May 2021, which  
 4 is calculated from internal, non-public Google financial data. Google spends significant resources  
 5 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
 6 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 7 by giving competitors insight into confidential Google financial information. Moreover, Google's  
 8 competitors could improperly utilize this internal, non-public data to modify or augment their business  
 9 operations in an effort to compete unfairly against Google.

10           **314. Exhibit 23, Page 207, Note 719 (between “Google Play store” and “is equal to”;**  
 11 **between “number of downloads” and “is estimated by”).** This text reflects the total number of paid  
 12 downloads and all downloads on Google Play from August 2019 to May 2021, which is calculated  
 13 from internal, non-public Google financial data. Google spends significant resources compiling and  
 14 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
 15 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 16 competitors insight into confidential Google financial information. For example, Google's competitors  
 17 could gain insight into Google's data on app downloads and knowledge of consumer spend behavior at  
 18 no cost, unfairly tailoring their own business strategy at Google's expense.

19           **315. Exhibit 23, Page 212, Note 745 (between “were approximately” and “installs**  
 20 **worldwide”;** **between “which approximately” and “were new downloads”;** **between “suggesting**  
 21 **more than” and “updates”).** This text reflects the total number of installs, including reinstallations  
 22 and app updates, on Google Play in October 2020. This information is calculated from internal, non-  
 23 public Google data. Google spends significant resources compiling and maintaining this valuable data,  
 24 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
 25 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 26 Google information. For example, Google's competitors could gain insight into Google's data on app  
 27 downloads and updates at no cost, unfairly tailoring their own business strategy at Google's expense.

316. **Exhibit 23, Page 217, Paragraph 392 (between “indicate that” and “of apps”; between “that only” and “of apps”; between “and that” and “of apps”; between “ignore that” and “of Android phones”; between “in June 2022” and “of Android devices”).** This text reflects confidential, non-public metrics on app and app store installations from Google Play as compared to non-Google Play sources. These metrics are calculated from internal, non-public Google data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and disclosure of this information would adversely impact Google’s current competitive position by giving Google’s competitors insight into Google’s estimate of its share of downloads in the Android app ecosystem.

317. **Exhibit 23, Page 217, Note 761 (between “In June 2022” and “percent of”).** This text reflects confidential, non-public data on the share of Android devices with third-party app stores preinstalled. This metric is calculated from internal, non-public Google data, which Google spends significant resources compiling and maintaining and is non-public. Disclosure of this information would adversely impact Google’s current competitive position by giving Google’s competitors insight into Google’s estimate of the share of Android devices with alternative app stores preinstalled.

318. **Exhibit 23, Page 218, Paragraph 393 (between “Google earned” and “of U.S. consumer”).** This text reflects the share of consumer spend from Google Play on tablets, and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. For example, Google's competitors could gain insight into Google's knowledge of consumer spending and device ownership at no cost, unfairly tailoring their own business strategy at Google's expense to compete more effectively with Google Play.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 27**

**[Dkt. No. 509-28]**

**(Exhibit D10)**

1           319.   **Exhibit 27, Page 276, Line 14 (between “risk by offering” and “to Match Group”).**  
 2 This text contains confidential, non-public information regarding confidential statements made during  
 3 negotiations with a particular developer. Disclosure of this non-public information is likely to result in  
 4 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
 5 competitor or potential business partner unfair leverage in competing against or negotiating with  
 6 Google. Moreover, Google’s competitors could use this information to unfairly target Google’s  
 7 developer partners.

8                   **Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment- Exhibit 29**  
 9   **[Dkt. No. 509-30]**  
 10   **(Exhibit D11)**

11           320.   **Exhibit 29, GOOG-PLAY-007346084 (logos below “Developer confusion” and**  
 12 **above “Inquiring”; Notes, between “Apps revenue is” and “of A&G revenue”; between**  
 13 **“growing” and “y/y”).** This information reflects and is calculated from internal, non-public Google  
 14 financial data. Google spends significant resources compiling and maintaining this valuable data,  
 15 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
 16 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 17 Google financial information. Further, this information reflects sensitive, highly confidential  
 18 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
 19 counterparties in negotiations with Google to gain an unfair advantage against Google. This text also  
 20 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 21 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 22 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
 23 of contractual terms and its own confidential statements made during negotiations.

24           321.   **Exhibit 29, GOOG-PLAY-007346085 (between start of sentence and “active App**  
 25 **& Game Devs”; between start of sentence and “active App Devs”; between start of sentence and**  
 26 **“active App Devs”; between “we believe only” and “of active developers”; between “devs such**  
 27 **as” and end of sentence).** This information contains non-public and confidential data regarding active  
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1 app and game developers on Google Play. This information has never been disclosed publicly and the  
2 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
3 influence the competitive decision-making and business strategies employed by Google's app store  
4 competitors, for example by influencing how those app stores market themselves to U.S. developers  
5 and how they distinguish themselves from Google Play in the eyes of U.S. developers. This text also  
6 contains confidential, non-public information regarding non-party developers, and implicates the non-  
7 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
8 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
9 of contractual terms and its own confidential statements made during negotiations.

10       **322. Exhibit 29, GOOG-PLAY-007346087 (rows one, four and five below "Partner",**  
11 **"Current reaction", and "Details").** This text contains confidential, non-public information  
12 regarding non-party developers, and implicates the non-parties' confidentiality interests by purporting  
13 to reveal the nonparties' confidential statements made during negotiations. Further, disclosure of this  
14 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
15 decision-making, which, for example, could give a competitor or potential business partner unfair  
16 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
17 this non-party information to unfairly target Google's developer partners.

18       **323. Exhibit 29, GOOG-PLAY-007346088 (entire chart).** This text contains confidential,  
19 non-public information regarding non-party developers, and implicates the non-parties' confidentiality  
20 interests by purporting to reveal the nonparties' confidential statements made during negotiations.  
21 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
22 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
23 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
24 competitors could use this non-party information to unfairly target Google's developer partners.

25       **324. Exhibit 29, GOOG-PLAY-007346089 (entire slide).** This text contains confidential,  
26 non-public information regarding non-party developers, and implicates the non-parties' confidentiality  
27 interests by purporting to reveal the nonparties' confidential statements made during negotiations.



Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

325. **Exhibit 29, GOOG-PLAY-007346090 (column under "Modular Google Play Billing", the first and third rows; between start of sentence and "Google Play is experimenting").** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

326. **Exhibit 29, GOOG-PLAY-007346091 (row two, three, five, six, seven and eight under "Spotify Gets"; row five, six, seven and eight under "Google Gets").** This text contains confidential, non-public information regarding Google's agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

327. **Exhibit 29, GOOG-PLAY-007346092 (between "KR Concerns" and "deploy local and partner programs").** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

328. **Exhibit 29, GOOG-PLAY-007346093 (between "annual spend" and "and"; between "and" and end of sentence; between "& mitigation plans" and "Redacted – Privilege";**

1 **between “Re-engage with” and “on custom solutions”**). This information contains non-public  
 2 information regarding Google’s confidential non-public internal strategic considerations related to  
 3 creating value for and attracting developers to the Google Play Store. This information has never been  
 4 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
 5 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
 6 to attract developers away from Google. Further, this text contains non-public and confidential  
 7 information relating to the apps annual spend in Korea. If disclosed, this data point could be used by  
 8 potential counterparties negotiating with Google as a benchmark, weakening Google's competitive  
 9 position.

10 329. **Exhibit 29, GOOG-PLAY-007346095 (between “annual spend” and “and”;**  
 11 **between “and” and end of sentence; between “some neutral feedback” and “Redacted –**  
 12 **Privilege”**). This information contains non-public information regarding Google’s confidential non-  
 13 public internal strategic considerations related to creating value for and attracting developers to the  
 14 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
 15 would adversely impact Google’s current competitive position by enabling Google’s competitors to  
 16 mimic its confidential strategies in an effort to attract developers away from Google. Further, this text  
 17 contains non-public and confidential information relating to the apps annual spend in India. If  
 18 disclosed, this data point could be used by potential counterparties negotiating with Google as a  
 19 benchmark, weakening Google's competitive position.

20 330. **Exhibit 29, GOOG-PLAY-007346101 (between “users with” and “in 2020”;**  
 21 **between “growing” and “Y/Y”; entire row under “2020 Forecast”; between “Inclusive” and “ads**  
 22 **revenue”**). This information reveals Google's internal non-public profit, consumer spend, revenue, and  
 23 financial calculations. These data sets are not otherwise publicly reported by the company and their  
 24 disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage.  
 25 Google's competitors could improperly utilize this internal, non-public data to modify or augment their  
 26 business operations in an effort to compete unfairly against Google. Moreover, visibility into consumer  
 27  
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1 spend gives Google's competitors improper insight into the financial health and future outlook of the  
2 Play business, which also arguably gives Google's competitors an unfair advantage.

3       331. **Exhibit 29, GOOG-PLAY-007346102 (between “driven by” and end of sentence;**  
4 **entire chart; between “only available for” and “apps and games”; between “installs and usage,**  
5 **such as” and end of sentence).** This information reveals Google's internal non-public profit, revenue,  
6 and financial calculations. These data sets are not otherwise publicly reported by the company and  
7 their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
8 advantage. Google's competitors could improperly utilize this internal, non-public data to modify or  
9 augment their business operations in an effort to compete unfairly against Google. Moreover, visibility  
10 into the breakdown of play revenue gives Google's competitors improper insight into the financial  
11 health and future outlook of the Play business, which also arguably gives Google's competitors an  
12 unfair advantage.

13       332. **Exhibit 29, GOOG-PLAY-007346103 (between start of sentence and “are in the**  
14 **Apps w. GPB”; between start of sentence and “(Spotify is off GPB”).** The disclosure of app  
15 developers' highly confidential information would significantly harm these app developers' business.  
16 For example, developer competitors could leverage this information to reap an unearned competitive  
17 advantage. They could exploit this information—that they otherwise would not have access to—to  
18 inform their own business strategies. To prevent these competitive harms from coming to fruition,  
19 these developers proactively maintain the confidentiality of its strategic information, only disclosing it  
20 to a select group of individuals on an as-needed basis.

21       333. **Exhibit 29, GOOG-PLAY-007346104 (between start of sentence and “of**  
22 **Apps/Games”; between “represent” and “of Play revenue”; entire infographic under “selling**  
23 **physical goods”; between “installs and usage, such as” and “are in the Apps w. GPB”; between**  
24 **start of sentence and “(Spotify is off GPB”).** This information reveals Google's internal non-public  
25 profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the  
26 company and their disclosure is likely to cause Google competitive harm and give its competitors an  
27 unfair advantage. Google's competitors could improperly utilize this internal, non-public data to  
28

1 modify or augment their business operations in an effort to compete unfairly against Google.  
 2 Moreover, visibility into the trends in the data (i.e., revenue percentages by app partners) gives  
 3 Google's competitors improper insight into the financial health and future outlook of the Play business,  
 4 which also arguably gives Google's competitors an unfair advantage. Furthermore, the disclosure of  
 5 app developers' highly confidential information would significantly harm these app developers'  
 6 business. For example, developer competitors could leverage this information to reap an unearned  
 7 competitive advantage. They could exploit this information—that they otherwise would not have  
 8 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
 9 fruition, these developers proactively maintain the confidentiality of its strategic information, only  
 10 disclosing it to a select group of individuals on an as-needed basis.

11       **334. Exhibit 29, GOOG-PLAY-007346106 (all numbers in row “2020F Play Consumer**  
 12 **Spend”; between “IOS estimate” and “in 2019”).** This information reflects and is calculated from  
 13 internal, non-public Google financial data. Google spends significant resources compiling and  
 14 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
 15 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 16 competitors insight into confidential Google financial information. Further, this information reflects  
 17 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
 18 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 19 against Google.

20       **335. Exhibit 29, GOOG-PLAY-007346107 (rows one, two and three under “Play**  
 21 **Revenue Share”; all numbers under column “Qualifying Dev Spend, as % of total Play Spend”).**  
 22 This information contains non-public information regarding Google's confidential non-public internal  
 23 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 24 This information has never been disclosed publicly. Disclosure of this information would adversely  
 25 impact Google's current competitive position by enabling Google's competitors to mimic its  
 26 confidential strategies in an effort to attract developers away from Google.

336. **Exhibit 29, GOOG-PLAY-007346109 (between “for long periods e.g.” and end of sentence; between “few FOPs e.g.” and “in Korea”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

337. **Exhibit 29, GOOG-PLAY-007346112 (between “estimated by calculating” and “Estimated engagement”; between “liveops campaigns” and “Estimated payments”; between “value using” and “Buyer creation”; between “Buyer creation” and “Spend stretch”; between “Spend stretch” and “Delivery value”; between “Delivery value” and “Growth consulting”; Notes, between “owned discovery” and “is so much bigger”; between “Growth consulting” and “consultations”; between “last 1.5 yrs” and “year”).** This information reveals Google's internal non-public profit, revenue, costs, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google.

338. **Exhibit 29, GOOG-PLAY-007346113 (between “alternatives is Plum” and end of sentence”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1           339.   **Exhibit 29, GOOG-PLAY-007346114 (entire chart).** This information reflects and is  
 2 calculated from internal, non-public Google financial data. Google spends significant resources  
 3 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
 4 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 5 by giving competitors insight into confidential Google financial information. Further, this information  
 6 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
 7 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
 8 advantage against Google.

9           340.   **Exhibit 29, GOOG-PLAY-007346115 (row one and three under “Perceived Play**  
 10 **value”; Notes, between “Where gaps exist” and “is among”; entire chart).** This information  
 11 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
 12 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
 13 competitors and potential business counterparties, could be used to disadvantage and cause Google  
 14 competitive harm by giving competitors insight into confidential Google financial information.  
 15 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
 16 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
 17 Google to gain an unfair advantage against Google.

18           341.   **Exhibit 29, GOOG-PLAY-007346117 (entire chart sans row one, column one**  
 19 **“Status Quo”).** This information reveals Google's internal non-public profit, revenue, and financial  
 20 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
 21 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
 22 competitors could improperly utilize this internal, non-public data to modify or augment their business  
 23 operations in an effort to compete unfairly against Google. This information also contains non-public  
 24 information regarding Google’s confidential non-public internal strategic considerations related to  
 25 creating value for and attracting developers to the Google Play Store. This information has never been  
 26 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
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1 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
2 to attract developers away from Google.

3       **342. Exhibit 29, GOOG-PLAY-007346118 (entire chart).** This information reveals  
4 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
5 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
6 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
7 internal, non-public data to modify or augment their business operations in an effort to compete  
8 unfairly against Google. This information also contains non-public information regarding Google's  
9 confidential non-public internal strategic considerations related to creating value for and attracting  
10 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
11 this information would adversely impact Google's current competitive position by enabling Google's  
12 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

13       **343. Exhibit 29, GOOG-PLAY-007346120 (between start of sentence and "of perceived**  
14 **value gap"; all numbers under column "Aggregate (Positive – Negative)"; all numbers under**  
15 **column "Positive Gap"; all numbers under column "Negative Gap"; all numbers under column**  
16 **"% of Total Negative Gap"; between start of sentence and "of total gap is concentrated";**  
17 **between start of sentence and "spread across GPB").** This information reveals Google's internal  
18 non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly  
19 reported by the company and their disclosure is likely to cause Google competitive harm and give its  
20 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
21 public data to modify or augment their business operations in an effort to compete unfairly against  
22 Google. This information also contains non-public information regarding Google's confidential non-  
23 public internal strategic considerations related to creating value for and attracting developers to the  
24 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
25 would adversely impact Google's current competitive position by enabling Google's competitors to  
26 mimic its confidential strategies in an effort to attract developers away from Google.



344. **Exhibit 29, GOOG-PLAY-007346122 (between “11.30 am today” and “Match”; between “11.30 am today” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

345. **Exhibit 29, GOOG-PLAY-007346124 (between “Match and” and “have a heads up”; between “Heads up to” and end of sentence; between “11.30 am today” and “Match”; between “11.30 am today” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

346. **Exhibit 29, GOOG-PLAY-007346127 (between “Today” and end of sentence; between “Ads Revenue” and “\$xxB”; between “is not limitless” and “Also, land in range”).** This text reflects revenue figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more

effectively with Google Play. This text also contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

347. **Exhibit 29, GOOG-PLAY-007346128 (all information under column "Most Lenient"; row one, three and four under column "Status Quo"; row one, three and four under column "More Aggressive"; row one, three and four under column "Middle Ground").** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

348. **Exhibit 29, GOOG-PLAY-007346129 (all numbers under columns "Aging Superstar: 5+ years, SBs later", "New Hit Game: Launched this month"; and "Subs App: Known Brand +Targeted Use").** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

349. **Exhibit 29, GOOG-PLAY-007346130 (between "Public LRAP" and "Option #1"; between "apply w/ Play for inclusion" and "Play normally re-invest"; between "give back to users" and end of sentence.** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of

1 this information would adversely impact Google’s current competitive position by enabling Google’s  
 2 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

3 350. **Exhibit 29, GOOG-PLAY-007346131 (between “mismatch/agitation” and “What**  
 4 **will the revenue”; between “Value Alignment + Equitability” and end of sentence).** This  
 5 information contains non-public information regarding Google’s confidential non-public internal  
 6 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 7 This information has never been disclosed publicly. Disclosure of this information would adversely  
 8 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 9 confidential strategies in an effort to attract developers away from Google.

10 351. **Exhibit 29, GOOG-PLAY-007346133 (entire chart).** This information contains non-  
 11 public information regarding Google’s confidential non-public internal strategic considerations related  
 12 to creating value for and attracting developers to the Google Play Store. This information has never  
 13 been disclosed publicly. Disclosure of this information would adversely impact Google’s current  
 14 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
 15 to attract developers away from Google.

16 352. **Exhibit 29, GOOG-PLAY-007346134 (entire chart).** This information reveals  
 17 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
 18 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
 19 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
 20 internal, non-public data to modify or augment their business operations in an effort to compete  
 21 unfairly against Google. Moreover, visibility into the trends in the data (i.e., projected figures into the  
 22 future and broken down by type of app) gives Google's competitors improper insight into the financial  
 23 health and future outlook of the Play business, which also arguably gives Google's competitors an  
 24 unfair advantage.

25 353. **Exhibit 29, GOOG-PLAY-007346135 (between “LTV-based” and “CPI-based”;**  
 26 **between “CPI-based” and “FOP”; between “FOP” and “Delivery”; between “Delivery” and end**  
 27 **of sentence).** This information contains non-public information regarding Google’s confidential non-  
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1 public internal strategic considerations related to creating value for and attracting developers to the  
2 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
3 would adversely impact Google’s current competitive position by enabling Google’s competitors to  
4 mimic its confidential strategies in an effort to attract developers away from Google.

5 354. **Exhibit 29, GOOG-PLAY-007346136 (entire chart).** This information contains non-  
6 public information regarding Google’s confidential non-public internal strategic considerations related  
7 to creating value for and attracting developers to the Google Play Store. This information has never  
8 been disclosed publicly. Disclosure of this information would adversely impact Google’s current  
9 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
10 to attract developers away from Google.

11 355. **Exhibit 29, GOOG-PLAY-007346137 (between start of sentence and “of Apps**  
12 **represented”; entire chart; between “only available for” and “apps and games”; between**  
13 **“installs and usage, such as” and end of sentence).** This information reflects and is calculated from  
14 internal, non-public Google financial data. Google spends significant resources compiling and  
15 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
16 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
17 competitors insight into confidential Google financial information. Further, this information reflects  
18 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
19 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
20 against Google.

21 356. **Exhibit 29, GOOG-PLAY-007346138 (between start of sentence and “are in the**  
22 **Apps w. GPB”; between start of sentence and “(Spotify is off GPB”).** The disclosure of these app  
23 developers’ highly confidential information would significantly harm these developers’ businesses. For  
24 example, other developer competitors could leverage this information to reap an unearned competitive  
25 advantage. They could exploit this information—that they otherwise would not have access to—to  
26 inform their own business strategies. To prevent these competitive harms from coming to fruition,

1 these developers proactively maintain the confidentiality of its strategic information, only disclosing it  
2 to a select group of individuals on an as-needed basis.

3 357. **Exhibit 29, GOOG-PLAY-007346139 (entire chart).** This information contains non-  
4 public information regarding Google’s confidential non-public internal strategic considerations related  
5 to creating value for and attracting developers to the Google Play Store. This information has never  
6 been disclosed publicly. Disclosure of this information would adversely impact Google’s current  
7 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
8 to attract developers away from Google.

9 358. **Exhibit 29, GOOG-PLAY-007346145 (between “meeting with” and “tomorrow”).**  
10 This text contains confidential, non-public information regarding non-party developers, and implicates  
11 the non-party’s confidentiality interests, by revealing the identity of Google business partners who are  
12 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
13 confidentiality of contractual terms and its own confidential statements made during negotiations.  
14 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
15 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
16 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
17 competitors could use this non-party information to unfairly target Google’s developer partners.

18 359. **Exhibit 29, GOOG-PLAY-007346149 (all information under column “On track for**  
19 **positive/ neutral launch?”).** This text contains confidential, non-public information regarding non-  
20 party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of  
21 Google business partners who are not party to this litigation, and who have a reasonable expectation  
22 that Google will maintain the confidentiality of contractual terms and its own confidential statements  
23 made during negotiations. Further, disclosure of this non-public information is likely to result in  
24 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
25 competitor or potential business partner unfair leverage in competing against or negotiating with  
26 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
27 Google’s developer partners.

1           360.   **Exhibit 29, GOOG-PLAY-007346150 (between “negative feedback from” and**  
 2 **“Redacted - Privilege”).** This text contains confidential, non-public information regarding non-party  
 3 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
 4 business partners who are not party to this litigation, and who have a reasonable expectation that  
 5 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
 6 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
 7 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 8 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 9 Google’s competitors could use this non-party information to unfairly target Google’s developer  
 10 partners.

11           361.   **Exhibit 29, GOOG-PLAY-007346151 (between “Y” and “Redacted - Privilege”;**  
 12 **between “Resolve feedback from” and “Deploy programs”).** This text contains confidential, non-  
 13 public information regarding non-party developers, and implicates the non-party’s confidentiality  
 14 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
 15 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
 16 and its own confidential statements made during negotiations. Further, disclosure of this non-public  
 17 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
 18 which, for example, could give a competitor or potential business partner unfair leverage in competing  
 19 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
 20 information to unfairly target Google’s developer partners.

21           362.   **Exhibit 29, GOOG-PLAY-007346152 (between “News Corp Papers” and “and**  
 22 **Stan”).** This text contains confidential, non-public information regarding non-party developers, and  
 23 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
 24 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
 25 maintain the confidentiality of contractual terms and its own confidential statements made during  
 26 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 27 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 28

1 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 2 Google's competitors could use this non-party information to unfairly target Google's developer  
 3 partners.

4       **363. Exhibit 29, GOOG-PLAY-007346153 (between "FOP Coverage Proposal" and**  
 5 **"Exceptions granted").** This information contains non-public information regarding Google's  
 6 confidential non-public internal strategic considerations related to creating value for and attracting  
 7 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
 8 this information would adversely impact Google's current competitive position by enabling Google's  
 9 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

10       **364. Exhibit 29, GOOG-PLAY-007346154 (column three in chart; column four in**  
 11 **chart).** This information contains non-public information regarding Google's confidential non-public  
 12 internal strategic considerations related to creating value for and attracting developers to the Google  
 13 Play Store. This information has never been disclosed publicly. Disclosure of this information would  
 14 adversely impact Google's current competitive position by enabling Google's competitors to mimic its  
 15 confidential strategies in an effort to attract developers away from Google.

16       **365. Exhibit 29, GOOG-PLAY-007346155 (between "program with" and "from**  
 17 **Government"; between "from Government" and "marketing investment"; between "receiving**  
 18 **direct funds" and "USD"; entire chart).** This information reflects and is calculated from internal,  
 19 non-public Google financial data. Google spends significant resources compiling and maintaining this  
 20 valuable data, which is non-public, and if revealed to competitors and potential business  
 21 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 22 competitors insight into confidential Google financial information. Further, this information reflects  
 23 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
 24 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 25 against Google.

26       **366. Exhibit 29, GOOG-PLAY-007346156 (between "combined & expanded for" and**  
 27 **"in hardware & software"; between "Content costs" and end of sentence; entire chart).** This text



contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Further, this text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

367. **Exhibit 29, GOOG-PLAY-007346157 (between “steps for engaging” and “External-facing”; all rows in “External-facing”; all rows in “Internal”).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Further, this text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 36**

**[Dkt. No. 509-37]**

**(Exhibit D12)**

368. **Exhibit 36, Page 87, Paragraph 177 (between “contracts with” and “the two largest”; between “agreement with” and “wherein”; between “to provide” and “with 25**

percent”; between “continued to pay” and “a 25 percent”; between “Google paid” and “leaving only”). This text contains confidential, non-public information regarding Google’s agreements with mobile carriers. The text reveals the identity of Google’s business partners, who are not party to this litigation and who have a reasonable expectation that Google will maintain the confidentiality of their contractual terms and confidential statements made during negotiations. The disclosure of the non-parties’ highly confidential information would significantly harm their respective businesses. For example, other entities could exploit this information—that they otherwise would not have access to—when negotiating with or competing against the non-party carriers. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

369. **Exhibit 36, Page 88, Paragraph 179 (between “were approximately” and “percent”; between “would have” and “its”; between “its” and “percent revenue”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

370. **Exhibit 36, Page 89, Footnote 412 (between “calculated at” and “of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

1           371.   **Exhibit 36, Page 94, Note 451 (between “GOOG-PLAY-002604372” and end of**  
2 **sentence).** This text contains confidential, non-public information regarding non-party OEMs, and  
3 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
4 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
5 maintain the confidentiality of contractual terms and confidential statements made during negotiations.  
6 Further, Google’s competitors could use this non-party information to unfairly target Google’s  
7 developer partners.

8           372.   **Exhibit 36, Page 95, Note 457 (between “MADA require” and “to appear”).** This  
9 text contains confidential, non-public information regarding Google’s agreements with non-party  
10 OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it  
11 reveals strategic decision-making which, for example, could give a competitor or potential business  
12 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
13 competitors could use this non-party information to unfairly target Google’s OEM partners and offer  
14 specific deal terms designed to undercut those offered by Google

15           373.   **Exhibit 26, Page 96, Paragraph 197 (between “importance to Samsung” and “And**  
16 **in questioning”; between “Google employee wrote” and end of sentence).** This text contains  
17 Google’s internal, non-public confidential analyses and statements regarding the placement of the Play  
18 Store on the home screens of mobile devices. This information has never been disclosed publicly and  
19 the Google Play product team treats it as strictly confidential. Disclosure of this non-public  
20 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
21 which, for example, could give a competitor or potential business partner unfair leverage in competing  
22 against or negotiating with Google.

23           374.   **Exhibit 36, Page 100, Paragraph 208 (between “Stylized as” and “these**  
24 **agreements”; between “these agreements” and “on the absence”).** This text contains confidential,  
25 non-public information regarding Google’s agreements with OEMs. Disclosure of this non-public  
26 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
27 making which, for example, could give a competitor or potential business partner unfair leverage in  
28

1 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
 2 party information to unfairly target Google's OEM partners and offer specific deal terms designed to  
 3 undercut those offered by Google.

4       **375. Exhibit 36, Page 100, Paragraph 209 (between "OEMs on a" and "if the OEM";**  
 5 **between "nearly" and "in 2020"; between "and up to" and "in 2023"; between "stated goal was"**  
 6 **and end of sentence).** This text contains confidential, non-public information regarding Google's  
 7 agreements with OEMs. Disclosure of this non-public information is likely to result in competitive  
 8 harm to Google, as it reveals Google's strategic decision-making which, for example, could give a  
 9 competitor or potential business partner unfair leverage in competing against or negotiating with  
 10 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 11 Google's OEM partners and offer specific deal terms designed to undercut those offered by Google.

12       **376. Exhibit 36, Page 100-101, Paragraph 210 (between "with at least" and "OEMs to**  
 13 **date"; between "projections for" and "OEMs"; between "anticipated" and "Premier Tier**  
 14 **devices"; between "2021" and "devices sold were").** This text contains confidential, non-public  
 15 information regarding Google's agreements with OEMs. Disclosure of this non-public information is  
 16 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making which,  
 17 for example, could give a competitor or potential business partner unfair leverage in competing against  
 18 or negotiating with Google.

19       **377. Exhibit 36, Page 100, Note 497 (between "GOOG-PLAY-000620210" and "GOOG-**  
 20 **PLAY-000620638"; between "GOOG-PLAY-000620638" and "GOOG-PLAY-005706338";**  
 21 **between "GOOG-PLAY-005706338" and "GOOG-PLAY-008111867"; between "GOOG-PLAY-**  
 22 **008111867" and "GOOG-PLAY-001745614"; between "GOOG-PLAY-001745614" and**  
 23 **"GOOG-PLAY-000416708"; between "GOOG-PLAY-000416708" and "GOOG-PLAY-**  
 24 **000620282"; between "GOOG-PLAY-000620282" and "GOOG-PLAY-000620442"; between**  
 25 **"GOOG-PLAY-000620442" and "GOOG-PLAY-000620131"; between "GOOG- PLAY-**  
 26 **000620131" and "GOOG-PLAY-005706436"; between "GOOG-PLAY-005706436" and**  
 27 **"GOOG-PLAY-005706676"; between "GOOG-PLAY-005706676" and "GOOG-PLAY-**  
 28

007038477”; between “GOOG-PLAY-007038477” and “GOOG-PLAY-007038511”; between “GOOG-PLAY-007038511” and “GOOG-PLAY-000620478”; between “GOOG-PLAY-000620478” and “GOOG-PLAY-005706728”; between “GOOG-PLAY-005706728” and “GOOG-PLAY-000416651”; between “GOOG-PLAY-000416651” and end of sentence). This text contains confidential, non-public information regarding non-party OEMs, and implicates the non-parties’ confidentiality interests, by revealing the identity of Google’s business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of their contractual terms and confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s OEM partners.

378. **Exhibit 36, Page 101, Note 500 (between “Id. at -173.R.” and “premier tier for”; between “premier tier for” and end of sentence).** This text contains confidential, non-public information regarding Google’s agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s OEM partners and offer specific deal terms designed to undercut those offered by Google.

379. **Exhibit 36, Page 102, Note 511 (between “(Co-marketing fund agreement)” and end of footnote).** This text contains non-public and confidential information regarding Google’s App Campaigns program. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

380. **Exhibit 36, Page 103, Paragraph 217 (between “as the” and “requirement”; between “required developers to” and “Google’s documents”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

381. **Exhibit 36, Page 103, Note 515 (between “would offer Samsung” and “Id. at -809.”; between “In return” and “only App stores”; between “home screen” and “Id. at -810—811.”).** This text contains confidential, non-public information regarding Google’s agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s OEM partners and offer specific deal terms designed to undercut those offered by Google.

382. **Exhibit 36, Page 103, Note 519 (between “impact of” and “requirement”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

383. **Exhibit 36, Page 104, Paragraph 218 (between “also imposed” and “provisions”; between “developers” and “when distributing”; between “GVP deal with” and “Such provisions”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive

1 harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
2 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
3 Google's competitors could use this non-party information to unfairly target Google's developer  
4 partners and offer specific deal terms designed to undercut those offered by Google.

5 384. **Exhibit 36, Page 105, Note 537 (between "metric at just" and "percent"; between**  
6 **"metric at just" and "percent").** This text contains non-public and confidential data regarding user  
7 engagement on Play Store. This information has never been disclosed publicly and the Google Play  
8 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
9 competitive decision-making and business strategies employed by Google's app store competitors, for  
10 example by influencing how those app stores market themselves to U.S. developers and how they  
11 distinguish themselves from Google Play in the eyes of U.S. developers.

12 385. **Exhibit 36, Page 106, Paragraph 223 (between "major game release" and**  
13 **"confirmed"; between "estimated the" and "(across all Apps)"; between "or between" and "of**  
14 **the amount").** This text contains non-public and confidential data regarding user engagement and  
15 consumer spending on Play Store. This information has never been disclosed publicly and the Google  
16 Play product team treats it as strictly confidential. If publicly revealed, this information could influence  
17 the competitive decision-making and business strategies employed by Google's app store competitors,  
18 for example by influencing how those app stores market themselves to U.S. developers and how they  
19 distinguish themselves from Google Play in the eyes of U.S. developers.

20 386. **Exhibit 36, Page 106-107, Paragraph 225 (between "Within one year" and "game**  
21 **developers"; between "holdouts" and "a popular gaming developer"; between "if" and "were to**  
22 **migrate"; between "impact would be" and "in spend"; between "of" and "defection from";**  
23 **between "offer to" and "that involved"; between "had offered" and "reinvestment" between**  
24 **"thereafter" and "signed a").** This text contains sensitive and confidential information regarding  
25 Google's agreements with developers, as well as Google's internal, non-public financial analyses of  
26 the impact that certain developers could have on consumer spending. This information has never been  
27 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
28



1 revealed, this information could influence the competitive decision-making and business strategies  
2 employed by Google's app store competitors, for example by influencing how those app stores market  
3 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
4 U.S. developers.

5       **387. Exhibit 36, Page 106, Note 541 (between "Play reinvests" and "See also"; between**  
6 **"Play takes" and "a developer"; between "reinvest those dollars towards" and end of sentence).**  
7 This text contains confidential, non-public information regarding Google's agreements with non-party  
8 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
9 as it reveals strategic decision-making which, for example, could give a competitor or potential  
10 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
11 competitors could use this non-party information to unfairly target Google's developer partners and  
12 offer specific deal terms designed to undercut those offered by Google.

13       **388. Exhibit 36, Page 106, Note 544 (between "Id." and "is therefore considering").**  
14 This text contains confidential, non-public information regarding non-party developers, and implicates  
15 the non-party's confidentiality interests, by revealing the identity of Google business partners who are  
16 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
17 confidentiality of contractual terms and confidential statements made during negotiations. Further,  
18 disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
19 Google's strategic decision-making, which, for example, could give a competitor or potential business  
20 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
21 competitors could use this non-party information to unfairly target Google's developer partners.

22       **389. Exhibit 36, Page 107, Paragraph 226 (between "resulted in" and "(2019-2022)";**  
23 **between "driving an" and "dollars in cross-platform").** This information reflects and is calculated  
24 from internal, non-public Google financial data. Google spends significant resources compiling and  
25 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
26 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
27 competitors insight into confidential Google financial information. Further, this information reflects  
28

1 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
 2 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 3 against Google.

4       **390. Exhibit 36, Page 107, Note 546 (between “As” and “has influence”; between “adds**  
 5 **up to” and “of Play revenue”; between “of Play revenue” and “would have”; between “margin**  
 6 **risk of” and “for Play”; between “risk of” and “defection”; between “percentage of” and “and”;**  
 7 **between “and” and “and to”; between “and to” and “a percentage”; between “spend into” and**  
 8 **end of sentence).** This text contains sensitive and confidential information regarding Google’s  
 9 agreements with developers, as well as Google’s internal, non-public financial analyses of the impact  
 10 that certain developers could have on consumer spending. This information has never been disclosed  
 11 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 12 information could influence the competitive decision-making and business strategies employed by  
 13 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 14 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

15       **391. Exhibit 36, Page 108, Paragraph 228 (between “estimate that the” and “game**  
 16 **developers”; between “accounted for” and “of all”; between “revenue and” and “of all App**  
 17 **revenue”; between “exclusively selling” and “of the most”).** This information reflects and is  
 18 calculated from internal, non-public Google financial data. Google spends significant resources  
 19 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
 20 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 21 by giving competitors insight into confidential Google financial information. Further, this information  
 22 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
 23 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
 24 advantage against Google.

25       **392. Exhibit 36, Page 108, Note 557 (between “with” and “excluded, supra”).** This text  
 26 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 27 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 28

to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

393. **Exhibit 36, Page 108, Note 560 (between “found that Hug” and “GOOG-PLAY-011269238 at -260”; between “whether the” and “and other developer stores”).** This text contains sensitive and confidential information regarding Google's internal, non-public analyses of the revenue risk posed by competing app stores. It includes estimates that reflect or are derived from Google's non-public, highly sensitive financial data. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

394. **Exhibit 36, Page 109-110, Paragraph 233 (between “relationship with” and “indicate that”; between “meeting with” and “Google explored”; between “whitelist” and “in exchange for”; between “in exchange for” and “agreeing to”; between “suggest that if” and “appeared”; between “pull the” and “app from the catalog”; between “suggests that” and “and Google”; between “the effect that” and “would not launch”; between “in August 2020” and “executive”; between “executive” and “wrote”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against

1 or negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
2 unfairly target Google’s developer partners.

3       **395. Exhibit 36, Page 109, Note 567 (between “same meeting” and “disclosed”; between**  
4 **“ads in the” and “GOOG-PLAY-004698100.R at -102.R”).** This text contains confidential, non-  
5 public information regarding non-party developers, and implicates the non-party’s confidentiality  
6 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
7 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
8 and confidential statements made during negotiations. Further, disclosure of this non-public  
9 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
10 making, which, for example, could give a competitor or potential business partner unfair leverage in  
11 competing against or negotiating with Google. Moreover, Google’s competitors could use this non-  
12 party information to unfairly target Google’s developer partners.

13       **396. Exhibit 36, Page 109, Note 568 (between “to \*update\*” and “apps only”; between**  
14 **“exchange for” and “limiting”).** This text contains confidential, non-public information regarding  
15 non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity  
16 of Google business partners who are not party to this litigation, and who have a reasonable expectation  
17 that Google will maintain the confidentiality of contractual terms and confidential statements made  
18 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
19 harm to Google, as it reveals Google’s strategic decision-making, which, for example, could give a  
20 competitor or potential business partner unfair leverage in competing against or negotiating with  
21 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
22 Google’s developer partners.

23       **397. Exhibit 36, Page 110, Paragraph 234 (between “seek and obtain” and**  
24 **“commitment”; between “preload” and “with installation”; between “Google gave” and**  
25 **“waivers”; between “waivers on” and “continuing”).** This text contains confidential, non-public  
26 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
27 revealing the identity of Google business partners who are not party to this litigation, and who have a  
28

1 reasonable expectation that Google will maintain the confidentiality of contractual terms and  
2 confidential statements made during negotiations. Further, disclosure of this non-public information is  
3 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making, which,  
4 for example, could give a competitor or potential business partner unfair leverage in competing against  
5 or negotiating with Google. Moreover, Google's competitors could use this non-party information to  
6 unfairly target Google's developer partners.

7       **398. Exhibit 36, Page 110-111, Paragraph 235 (between "Google offered" and "a**  
8 **technology"; between "known as" and "to improve"; between "apps shown in" and "Ms.**  
9 **Rasanen"; between "goal of the" and "product"; between "to make" and "want to cease";**  
10 **between "via any" and "apps distributed"; between "while offering" and "an opportunity";**  
11 **between "to test" and "When"; between "go back to" and "and propose a"; between "and**  
12 **propose a" and "trial agreement"; between "apps that use" and end of sentence).** This text  
13 contains confidential, non-public information regarding non-party developers, and implicates the non-  
14 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
15 to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality  
16 of contractual terms and confidential statements made during negotiations. Further, disclosure of this  
17 non-public information is likely to result in competitive harm to Google, as it reveals Google's  
18 strategic decision-making, which, for example, could give a competitor or potential business partner  
19 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
20 could use this non-party information to unfairly target Google's developer partners.

21       **399. Exhibit 36, Page 110, Note 571 (between "understanding that" and "only had";**  
22 **between "agreement with" and "regarding").** This text contains confidential, non-public  
23 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
24 revealing the identity of Google business partners who are not party to this litigation, and who have a  
25 reasonable expectation that Google will maintain the confidentiality of contractual terms and  
26 confidential statements made during negotiations. Further, disclosure of this non-public information is  
27 likely to result in competitive harm to Google, as it reveals Google's strategic decision-making, which,  
28

1 for example, could give a competitor or potential business partner unfair leverage in competing against  
2 or negotiating with Google. Moreover, Google's competitors could use this non-party information to  
3 unfairly target Google's developer partners.

4 400. Exhibit 36, Page 110, Note 573 (between "certain point did" and "and Google";  
5 between "agreement regarding" and "install permissions"; between "A. Yes." And "has agreed";  
6 between "Purnima Kochikar to" and "stating"; between "assurance that" and "has  
7 deprioritized/stopped"; between "asking" and "to confirm that"; between "to confirm that" and  
8 "is not pursue"; between "outside of the" and "experiments"). This text contains confidential,  
9 non-public information regarding non-party developers, and implicates the non-party's confidentiality  
10 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
11 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
12 and confidential statements made during negotiations. Further, disclosure of this non-public  
13 information is likely to result in competitive harm to Google, as it reveals Google's strategic decision-  
14 making, which, for example, could give a competitor or potential business partner unfair leverage in  
15 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
16 party information to unfairly target Google's developer partners.

17 401. Exhibit 36, Page 111, Paragraph 236 (between "offered" and "at significant cost";  
18 between "to structure" and "to motivate"; between "to motivate" and "to avoid"; between  
19 "compared" and "competing in"; between "give" and "something they want"; between  
20 "essentially handing" and "billions"). This text contains confidential, non-public information  
21 regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing  
22 the identity of Google business partners who are not party to this litigation, and who have a reasonable  
23 expectation that Google will maintain the confidentiality of contractual terms and confidential  
24 statements made during negotiations. Further, disclosure of this non-public information is likely to  
25 result in competitive harm to Google, as it reveals Google's strategic decision-making, which, for  
26 example, could give a competitor or potential business partner unfair leverage in competing against or  
27

1 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 2 unfairly target Google’s developer partners.

3       402.   **Exhibit 36, Page 111-112, Paragraph 237 (between “negotiations and” and “trial**  
 4 **periods”; between “attempt to slow” and “progress”; between “to provide” and “with”; between**  
 5 **“with” and “on a trial basis”; between “to threaten” and “with termination”; between “trial**  
 6 **period” and “used”; between “used” and “over the course”; between “testimony indicates that”**  
 7 **and “currently”; between “uses” and “(now called”).** This text contains confidential, non-public  
 8 information regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
 9 revealing the identity of Google business partners who are not party to this litigation, and who have a  
 10 reasonable expectation that Google will maintain the confidentiality of contractual terms and  
 11 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 12 likely to result in competitive harm to Google, as it reveals Google’s strategic decision-making, which,  
 13 for example, could give a competitor or potential business partner unfair leverage in competing against  
 14 or negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
 15 unfairly target Google’s developer partners.

16       403.   **Exhibit 36, Page 111, Note 576 (between “via any” and “apps distributed”;**  
 17 **between “offering” and “an opportunity to test”; between “an opportunity to test” and end of**  
 18 **sentence).** This text contains confidential, non-public information regarding non-party developers, and  
 19 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
 20 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
 21 maintain the confidentiality of contractual terms and confidential statements made during negotiations.  
 22 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 23 it reveals Google’s strategic decision-making, which, for example, could give a competitor or potential  
 24 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 25 competitors could use this non-party information to unfairly target Google’s developer partners.

26       404.   **Exhibit 36, Page 111, Note 577 (between “go back to” and “and propose a”;**  
 27 **between “and propose a” and “trial agreement”; between “apps that use” and “GOOG-PLAY-**  
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1 **006367390”; between “explaining that” and “is “[w]illing to”; between “continue testing” and**  
 2 **“Rasanen Dep. 204:9-16”; between “apps that use” and “A. I believe”).** This text contains  
 3 confidential, non-public information regarding non-party developers, and implicates the non-party’s  
 4 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 5 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
 6 contractual terms and confidential statements made during negotiations. Further, disclosure of this non-  
 7 public information is likely to result in competitive harm to Google, as it reveals Google’s strategic  
 8 decision-making, which, for example, could give a competitor or potential business partner unfair  
 9 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 10 this non-party information to unfairly target Google’s developer partners.

11 **405. Exhibit 36, Page 111, Note 582 (between “Verbally signal to” and “that our**  
 12 **intent”).** This text contains confidential, non-public information regarding non-party developers, and  
 13 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
 14 partners who are not party to this litigation, and who have a reasonable expectation that Google will  
 15 maintain the confidentiality of contractual terms and confidential statements made during negotiations.  
 16 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 17 it reveals Google’s strategic decision-making, which, for example, could give a competitor or potential  
 18 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 19 competitors could use this non-party information to unfairly target Google’s developer partners.

20 **406. Exhibit 36, Page 111, Note 583 (between “Google and” and “entered”; between**  
 21 **“permitting” and “to test”; between “to test” and “for”).** This text contains confidential, non-  
 22 public information regarding non-party developers, and implicates the non-party’s confidentiality  
 23 interests, by revealing the identity of Google business partners who are not party to this litigation, and  
 24 who have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
 25 and confidential statements made during negotiations. Further, disclosure of this non-public  
 26 information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-  
 27 making, which, for example, could give a competitor or potential business partner unfair leverage in  
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1 competing against or negotiating with Google. Moreover, Google’s competitors could use this non-  
2 party information to unfairly target Google’s developer partners.

3       **407. Exhibit 36, Page 112, Note 584 (between “know if” and “currently uses”; between**  
4 **“version of” and “A. I believe”; between “when did” and “rebrand”; between “new name to”**  
5 **and “A. I am”).** This text contains confidential, non-public information regarding non-party  
6 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
7 business partners who are not party to this litigation, and who have a reasonable expectation that  
8 Google will maintain the confidentiality of contractual terms and confidential statements made during  
9 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
10 to Google, as it reveals Google’s strategic decision-making, which, for example, could give a  
11 competitor or potential business partner unfair leverage in competing against or negotiating with  
12 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
13 Google’s developer partners.

14       **408. Exhibit 36, Page 112, Note 588 (between “such as Chrome” and “Id.”; between**  
15 **“showing, e.g., Chrome with a” and end of sentence).** This information contains non-public and  
16 confidential data regarding malware install rates on Google Play. This information has never been  
17 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
18 revealed, this information could influence the competitive decision-making and business strategies  
19 employed by Google’s app store competitors, for example by influencing how those app stores market  
20 themselves to U.S. developers and consumers, and how they distinguish themselves from Google Play  
21 in the eyes of U.S. developers and consumers.

22       **409. Exhibit 36, Page 129, Note 660 (between “indicate that” and “of consumer spend”).**  
23 This information reflects and is calculated from internal, non-public Google financial data. Google  
24 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
25 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
26 Google competitive harm by giving competitors insight into confidential Google financial information.  
27 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
28

1 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
2 Google to gain an unfair advantage against Google.

3       410. **Exhibit 36, Page 130, Paragraph 285 (between “alternative payment options” and**  
4 **end of sentence).** This text contains non-public and confidential data regarding Google’s internal  
5 analyses of alternative payment options offered by developers. This information has never been  
6 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
7 revealed, this information could influence the competitive decision-making and business strategies  
8 employed by Google’s app store competitors, for example by influencing how those app stores market  
9 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
10 U.S. developers. Further, disclosure of this non-public information is likely to result in competitive  
11 harm to Google, as it reveals Google’s strategic decision-making which, for example, could give a  
12 competitor or potential business partner unfair leverage in competing against or negotiating with  
13 Google.

14       411. **Exhibit 36, Page 130, Note 667 (between “GOOG-PLAY-007755618 at 5619” and**  
15 **“See also”).** This text contains non-public and confidential data regarding Google’s internal analyses  
16 of alternative payment options offered by developers. This information has never been disclosed  
17 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
18 information could influence the competitive decision-making and business strategies employed by  
19 Google’s app store competitors, for example by influencing how those app stores market themselves to  
20 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.  
21 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
22 it reveals Google’s strategic decision-making which, for example, could give a competitor or potential  
23 business partner unfair leverage in competing against or negotiating with Google.

24       412. **Exhibit 36, Page 131, Note 671 (between “in excess of” and “of consumer**  
25 **expenditures”).** This information reflects and is calculated from internal, non-public Google financial  
26 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
27 public, and if revealed to competitors and potential business counterparties, could be used to  
28

disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

413. **Exhibit 36, Page 137, Fourth bullet point (between “approximately” and “percent of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential analyses by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

414. **Exhibit 36, Page 137, Note 683 (between “to be” and “percent of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential analyses by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

415. **Exhibit 36, Page 140, Paragraph 305 (between “take rate of” and “percent”; between “observed value of” and “percent”; between “App Distribution Market is” and “down”; between “observed price of” and “net of”; between “consumers of” and “per paid App”; between “equal to” and “which demonstrates impact”; between “damages of” and “equal to”; between “equal to” and “paid App download”).** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the service fee rate that Google would charge in a but-for world according to Plaintiffs' expert's calculations, which are

1 derived from Google's highly confidential transactional data. Google spends significant resources  
2 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
3 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
4 by giving competitors insight into confidential Google financial information. For example, if disclosed,  
5 this data point could be used by potential counterparties negotiating with Google as a benchmark,  
6 weakening Google's competitive position.

7       **416. Exhibit 36, Page 141, Table 6 (all numbers under column “Value”; Notes, between**  
8 **“over the period” and “I calculated”; between “I summed the” and “fields”).** This information  
9 reflects and is calculated from internal, non-public Google financial data. It includes information  
10 relating to the service fee rate that Google would charge in a but-for world according to Plaintiffs'  
11 expert's calculations, which are derived from Google's highly confidential transactional data. Google  
12 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
13 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
14 Google competitive harm by giving competitors insight into confidential Google financial information.  
15 For example, if disclosed, this data point could be used by potential counterparties negotiating with  
16 Google as a benchmark, weakening Google's competitive position.

17       **417. Exhibit 36, Page 148, Paragraph 318 (between “platform model of” and “percent”;**  
18 **between “15 percent” and “offered”; between “such as” and “and others”).** This text contains  
19 non-public and confidential information regarding Google's Living Room Accelerator Program,  
20 including the identities of specific non-party developers with whom the program was discussed. These  
21 developers have a reasonable expectation that Google will maintain the confidentiality of contractual  
22 terms and confidential statements made by or to Google during negotiations. This information has  
23 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
24 publicly revealed, this information could influence the competitive decision-making and business  
25 strategies employed by Google's app store competitors, for example by influencing how those app  
26 stores market themselves to developers and how they distinguish themselves from Google Play in the  
27 eyes of developers. The text also includes information relating to the service fee rate that Google

1 would charge in a but-for world according to Plaintiffs' expert's calculations, which are derived from  
2 Google's highly confidential transactional data. Google spends significant resources compiling and  
3 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
4 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
5 competitors insight into confidential Google financial information.

6 418. **Exhibit 36, Page 148, Note 729 (between “offered a” and “percent take rate”;**  
7 **between “developers such as” and “and others”; between “take rates of” and “see GOOG-**  
8 **PLAY-000442329 at -345—346”; between “and” and “see GOOG-PLAY-000338849.R at -**  
9 **888.R”).** This text contains non-public and confidential information regarding Google's Living Room  
10 Accelerator Program, including the identities of specific non-party developers with whom the program  
11 was discussed as well as specific deal terms that were contemplated or offered. These developers have  
12 a reasonable expectation that Google will maintain the confidentiality of contractual terms and  
13 confidential statements made by or to Google during negotiations. This information has never been  
14 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
15 revealed, this information could influence the competitive decision-making and business strategies  
16 employed by Google's app store competitors, for example by influencing how those app stores market  
17 themselves to developers and how they distinguish themselves from Google Play in the eyes of  
18 developers.

19 419. **Exhibit 36, Page 151, Paragraph 323 (between “processing at just” and “percent”;**  
20 **between “costs came to” and “percent”).** This information reveals Google's internal non-public cost  
21 calculations. This data is not otherwise publicly reported by the company and its disclosure is likely to  
22 cause Google competitive harm and give its competitors an unfair advantage. Google's competitors  
23 could improperly utilize this internal, non-public data to modify or augment their business operations  
24 in an effort to compete unfairly against Google. Moreover, visibility into this data gives Google's  
25 competitors improper insight into the financial health and future outlook of the Play business, which  
26 also arguably gives Google's competitors an unfair advantage.

1           420.   **Exhibit 36, Page 151-152, Paragraph 324 (between “costs came to” and “percent”;**  
 2 **between “estimated at” and “percent”; between “marginal costs” and “percent of revenues”).**

3 This information reflects and is calculated from internal, non-public Google financial data. Google  
 4 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
 5 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 6 Google competitive harm by giving competitors insight into confidential Google financial information.  
 7 For example, this information could be referenced by potential counterparties in negotiations with  
 8 Google to gain an unfair advantage against Google.

9           421.   **Exhibit 36, Page 151, Note 739 (between “Google’s average” and “percent”;**  
 10 **between “costs are” and “for 2,300”; between “and” and “for the vast majority”).** This  
 11 information reflects and is calculated from internal, non-public Google financial data. Google spends  
 12 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 13 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 14 Google competitive harm by giving competitors insight into confidential Google financial information.  
 15 For example, this information could be referenced by potential counterparties in negotiations with  
 16 Google to gain an unfair advantage against Google.

17           422.   **Exhibit 36, Page 151, Note 740 (between “blended rate of” and “percent”).** This  
 18 information reveals Google's internal non-public cost calculations. This data is not otherwise publicly  
 19 reported by the company and its disclosure is likely to cause Google competitive harm and give its  
 20 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
 21 public data to modify or augment their business operations in an effort to compete unfairly against  
 22 Google. Moreover, visibility into this data gives Google's competitors improper insight into the  
 23 financial health and future outlook of the Play business, which also arguably gives Google's  
 24 competitors an unfair advantage.

25           423.   **Exhibit 36, Page 154, Paragraph 330 (between “Aftermarket came to” and**  
 26 **“between”; between “Google collected” and “in U.S. commissions”; between “actual world of”**  
 27 **and “percent”; between “transaction volume was” and “implying”; between “transaction of”**



1 and “Google received”; between “Google received” and “per transaction”; between “estimated  
 2 at” and “percent”; between “or” and “per transaction”; between “over cost of” and “percent”;  
 3 between “elasticity is” and “By equation”; between “elasticity is” and “The values”). This  
 4 information reflects and is calculated from internal, non-public Google financial data. Google spends  
 5 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 6 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 7 Google competitive harm by giving competitors insight into confidential Google financial information.  
 8 For example, this information could be referenced by potential counterparties in negotiations with  
 9 Google to gain an unfair advantage against Google.

10 424. **Exhibit 36, Page 154, Note 763 (between “Equal to” and end of sentence).** This  
 11 information reflects and is calculated from internal, non-public Google financial data. Google spends  
 12 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 13 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 14 Google competitive harm by giving competitors insight into confidential Google financial information.  
 15 For example, this information could be referenced by potential counterparties in negotiations with  
 16 Google to gain an unfair advantage against Google.

17 425. **Exhibit 36, Page 154, Note 764 (between “Equal to” and end of sentence).** This  
 18 information reflects and is calculated from internal, non-public Google financial data. Google spends  
 19 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 20 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 21 Google competitive harm by giving competitors insight into confidential Google financial information.  
 22 For example, this information could be referenced by potential counterparties in negotiations with  
 23 Google to gain an unfair advantage against Google.

24 426. **Exhibit 36, Page 155, Table 8 (all numbers under column “Value”; text in column**  
 25 **“Source/Notes” between “equal to” and “of consumer expenditure”).** This information reflects  
 26 and is calculated from internal, non-public Google financial data. It includes information relating to the  
 27 prices that consumers would pay in a but-for world, according to Plaintiffs’ expert’s calculations,  
 28

1 which are derived from confidential Google data. Google spends significant resources compiling and  
2 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
3 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
4 competitors insight into confidential Google financial information. For example, this information could  
5 be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
6 against Google.

7       **427. Exhibit 36, Page 156-157, Paragraph 332 (between “calculated at” and “which**  
8 **implies”; between “margin of” and “percent”; between “fall to” and “per transaction”; between**  
9 **“savings of” and “per transaction”; between “come to” and “over the time”; between “fall to”**  
10 **and “percent”; between “would be” and “percent”).** This information reflects and is calculated  
11 from internal, non-public Google financial data. It includes information relating to the prices that  
12 would exist in a but-for world, according to Plaintiffs’ expert’s calculations, which are derived from  
13 confidential Google data. Google spends significant resources compiling and maintaining this  
14 valuable data, which is non-public, and if revealed to competitors and potential business  
15 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
16 competitors insight into confidential Google financial information. For example, this information could  
17 be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
18 against Google.

19       **428. Exhibit 36, Page 203, Table 17 (all numbers under column “% of all Units Sold”;**  
20 **all numbers under column “% of all Consumer Expenditures”).** This information reflects and is  
21 calculated from internal, non-public Google financial data. Google spends significant resources  
22 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
23 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
24 by giving competitors insight into confidential Google financial information. For example, this  
25 information could be referenced by potential counterparties in negotiations with Google to gain an  
26 unfair advantage against Google.

429. **Exhibit 36, Page 203, Table 18 (all numbers under column “Android App Distribution Market (Table 6)”;** all numbers under column “In-App Aftermarket (Table 8)”; all numbers under column “Aggregate”). This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the prices that would exist in a but-for world, according to Plaintiffs’ expert’s calculations, which are derived from confidential Google data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. For example, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

430. **Exhibit 36, Page 203, Paragraph 415 (between “come to” and “and aggregate damages”;** between “Aftermarket come to” and end of sentence). This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the prices that would exist in a but-for world, according to Plaintiffs’ expert’s calculations, which are derived from confidential Google data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. For example, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 41**  
**[Dkt. No. 509-42]**  
**(Exhibit D13)**

431. **Exhibit 41, Page 286, Line 9 (between “usage is” and “but the ability”).** This information contains non-public and confidential data regarding app store performance. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. Google spends significant resources compiling and maintaining this valuable data, which

1 is non-public, and if revealed to competitors and potential business counterparties, could be used to  
 2 disadvantage and cause Google competitive harm by giving competitors insight into the financial  
 3 performance or commercial success of Google Play. For example, this information, if revealed, could  
 4 be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 5 against Google.

6 432. **Exhibit 41, Page 286, Line 10 (between “store is” and “is that consistent”).** This  
 7 information contains non-public and confidential data regarding app store performance. This  
 8 information has never been disclosed publicly and the Google Play product team treats it as strictly  
 9 confidential. Google spends significant resources compiling and maintaining this valuable data, which  
 10 is non-public, and if revealed to competitors and potential business counterparties, could be used to  
 11 disadvantage and cause Google competitive harm by giving competitors insight into the financial  
 12 performance or commercial success of Google Play. For example, this information, if revealed, could  
 13 be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 14 against Google.

15 **Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 44**

16 **[Dkt. No. 509-45]**

17 **(Exhibit D14)**

18 433. **Exhibit 44, GOOG-PLAY-000838161, Paragraph 2 (between “services like Match”**  
 19 **and “began as”).** The disclosure of developers' highly confidential information would significantly  
 20 harm developers' business. For example, developers' competitors could leverage this information to  
 21 reap an unearned competitive advantage. They could exploit this information—that they otherwise  
 22 would not have access to—to inform their own business strategies. To prevent these competitive harms  
 23 from coming to fruition, developers proactively maintain the confidentiality of its strategic  
 24 information, only disclosing it to a select group of individuals on an as-needed basis.

25 434. **Exhibit 44, GOOG-PLAY-000838161, Paragraph 3 (between “services like Match”**  
 26 **and “on to GPB”).** The disclosure of the developer’s highly confidential information would  
 27 significantly harm the developer’s business. For example, the developer’s competitors could leverage  
 28

1 this information to reap an unearned competitive advantage. They could exploit this information—that  
 2 they otherwise would not have access to—to inform their own business strategies. To prevent these  
 3 competitive harms from coming to fruition, the developer proactively maintains the confidentiality of  
 4 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

5       **435. Exhibit 44, GOOG-PLAY-000838164, Line 3 (between “2nd among all apps” and**  
 6 **“is 1st”).** This text contains confidential, non-public information regarding non-party developers, and  
 7 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
 8 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
 9 maintain the confidentiality of contractual terms and its own confidential statements made during  
 10 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 11 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 12 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 13 Google’s competitors could use this non-party information to unfairly target Google’s developer  
 14 partners.

15       **Plaintiffs’ Opposition to Google’s Motion for Partial Summary Judgment - Exhibit 45**

16                               **[Dkt. No. 509-46]**

17                               **(Exhibit D15)**

18       **436. Exhibit 45, Page -313 (between “is going to be” and “revenue business”; between**  
 19 **“in 2019” and “consumer spend”; between “consumer spend” and “y/y/ growth”; between “y/y/**  
 20 **growth” and “comes from In App”; between “going to be a” and “business in 2019”; between**  
 21 **“business in 2019” and “consumer spend”; entire graph).** This information reveals Google's  
 22 internal non-public profit, revenue, and financial calculations. These data sets are not otherwise  
 23 publicly reported by the company and their disclosure is likely to cause Google competitive harm and  
 24 give its competitors an unfair advantage. Google's competitors could improperly utilize this internal,  
 25 non-public data to modify or augment their business operations in an effort to compete unfairly against  
 26 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
 27  
 28

Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

437. **Exhibit 45, Page -314 (between “except for the following cases:” and “Prominent digital goods sellers”; all logos in slide after “Tinder”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

438. **Exhibit 45, Page -315 (all logos on slide below “native default payment options” and “from developers”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

439. **Exhibit 45, Page -316 (between “invested in commerce (e.g.” and “Partners whose investments in”; between “has outpaced ours” and “Mature game devs”; between “Mature game devs” and end of slide).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google

will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

440. **Exhibit 45, Page -319 (between “concerns from” and “differentiating from”; between “Concern /” and “Self preferencing.”; between “price on Android and iOS” and “Short term: Expanded Accelerator”).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

441. **Exhibit 45, Page -322 (between “temporary solution last year” and end of slide).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the



1 confidentiality of contractual terms and its own confidential statements made during negotiations.  
2 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
3 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
4 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
5 competitors could use this non-party information to unfairly target Google's developer partners.

6 442. **Exhibit 45, Page -323 (between "Android investment" and "3 proposed**  
7 **approaches"; all text below "3 proposed approaches:"; entire graph; all text in rows named "Est.**  
8 **Play Value" and "Play Rev" and "Consumer Spend").** This information contains non-public and  
9 confidential data regarding strategies for attracting developers on Google Play. This information has  
10 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
11 publicly revealed, this information could influence the competitive decision-making and business  
12 strategies employed by Google's app store competitors, for example by influencing how those app  
13 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
14 the eyes of U.S. developers.

15 443. **Exhibit 45, Page -324 (all text below "but not limited to").** This text contains  
16 confidential, non-public information regarding Google's agreements with non-party developers.  
17 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
18 strategic decision-making which, for example, could give a competitor or potential business partner  
19 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
20 could use this non-party information to unfairly target Google's developer partners and offer specific  
21 deal terms designed to undercut those offered by Google.

22 444. **Exhibit 45, Page -325 (logo between "Rev Share, Pricing " and "It is unfair that").**  
23 This text contains confidential, non-public information regarding non-party developers, and implicates  
24 the non-party's confidentiality interests, by revealing the identity of Google business partners who are  
25 not party to this litigation, and who has a reasonable expectation that Google will maintain the  
26 confidentiality of contractual terms and its own confidential statements made during negotiations.  
27 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
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1 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 2 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 3 competitors could use this non-party information to unfairly target Google's developer partners.

4 445. **Exhibit 45, Page -329 (between "Principles" and "Risks: Games contagion").** This  
 5 information contains non-public and confidential data regarding developer relations on Google Play.  
 6 This information has never been disclosed publicly and the Google Play product team treats it as  
 7 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 8 making and business strategies employed by Google's app store competitors, for example by  
 9 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 10 themselves from Google Play in the eyes of U.S. developers.

11 446. **Exhibit 45, Page -330 (between "platform & GPB investment" and "All"; between**  
 12 **"All" and "Consistent Policy Enforcement"; rows named "Vertical-specific product**  
 13 **integrations" and "V2 Performance boost"; between "drive adoption (e.g." and "b) GPB where**  
 14 **we"; between "would range from" and "(depending on eligibility"; between "Likely to target"**  
 15 **and "(based on priority"; between "Current LRAP program:" and "active partners in"; between**  
 16 **"in program. Top" and "drive"; between "drive" and "of total LRAP consumer"; between**  
 17 **"(Total =" and "of subs H1 spend"; between "not part of LRAP" and "but are integrated with").**  
 18 This information contains non-public and confidential data regarding developer outreach and  
 19 partnerships on Google Play. This information has never been disclosed publicly and the Google Play  
 20 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
 21 competitive decision-making and business strategies employed by Google's app store competitors, for  
 22 example by influencing how those app stores market themselves to U.S. developers and how they  
 23 distinguish themselves from Google Play in the eyes of U.S. developers. This text also contains  
 24 confidential, non-public information regarding non-party developers, and implicates the non-party's  
 25 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 26 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
 27 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 28

1 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 2 decision-making, which, for example, could give a competitor or potential business partner unfair  
 3 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 4 this non-party information to unfairly target Google’s developer partners.

5 447. **Exhibit 45, Page -335 (between “Alternatives” and end of slide).** This information  
 6 contains non-public information regarding Google’s confidential non-public internal strategic  
 7 considerations related to creating value for and attracting developers to the Google Play Store. This  
 8 information has never been disclosed publicly. Disclosure of this information would adversely impact  
 9 Google’s current competitive position by enabling Google’s competitors to mimic its confidential  
 10 strategies in an effort to attract developers away from Google.

11 448. **Exhibit 45, Page -336 (entire graph).** This information contains non-public  
 12 information regarding Google’s confidential non-public internal strategic considerations related to  
 13 creating value for and attracting developers to the Google Play Store. This information has never been  
 14 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
 15 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
 16 to attract developers away from Google.

17 449. **Exhibit 45, Page -339 (all text below “Spotify’s specific concerns”).** The disclosure  
 18 of the developer's highly confidential information would significantly harm the developer's business.  
 19 For example, the developer's competitors could leverage this information to reap an unearned  
 20 competitive advantage. They could exploit this information—that they otherwise would not have  
 21 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
 22 fruition, the developer proactively maintains the confidentiality of its strategic information, only  
 23 disclosing it to a select group of individuals on an as-needed basis.

24 450. **Exhibit 45, Page -342 (between beginning of slide and “can help land the”; logo**  
 25 **next to “Match”; between “Google can advance user experience” and “Investigate alternatives”;**  
 26 **all text below “Investigate alternatives:”).** This information contains non-public information  
 27 regarding Google’s confidential non-public internal strategic considerations related to creating value  
 28

1 for and attracting developers to the Google Play Store. This information has never been disclosed  
 2 publicly. Disclosure of this information would adversely impact Google's current competitive position  
 3 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
 4 away from Google.

5 451. **Exhibit 45, Page -347 (between "default payment options:" and "Korean dating**  
 6 **partners"; between "Korean dating partners:" and "More are at risk"; between "Other apps:"**  
 7 **and "Games:"; between "Games:" and "Status").** This text contains confidential, non-public  
 8 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
 9 revealing the identity of Google business partners who are not party to this litigation, and who has a  
 10 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 11 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 12 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 13 example, could give a competitor or potential business partner unfair leverage in competing against or  
 14 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
 15 unfairly target Google's developer partners.

16 **Plaintiffs' Opposition to Google's Motion for Partial Summary Judgment- Exhibit 49**

17 **[Dkt. No. 509-50]**

18 **(Exhibit D16)**

19 452. **Exhibit 49, Page -140 (between "hurt user experience and revenue." and "And**  
 20 **with this additional tax"; between "across our platforms and globally assuming" and "We would**  
 21 **work with you").** This text contains non-public information regarding confidential statements made  
 22 during negotiations between Google and a developer, including regarding the status of non-public  
 23 technical development efforts by Google. Disclosure of this non-public information is likely to result  
 24 in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give  
 25 a competitor or potential business partner unfair leverage in competing against or negotiating with  
 26 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 27 Google's developer partners.



1           **456. Exhibit 52, Page 43, Paragraph 52, Note 78 (between “% of sideloaded app” of**  
2 **and “over the 2019 and 2020”).** This information contains non-public and confidential data  
3 regarding user download behavior regarding sideloading on Android. This information has never been  
4 disclosed publicly and the Android and Google Play product teams treat it as strictly confidential. If  
5 publicly revealed, this information could influence the competitive decision-making and business  
6 strategies employed by Google’s app store competitors, for example by influencing how those app  
7 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
8 the eyes of U.S. developers.

9           **457. Exhibit 52, Page 164, Paragraph 246, Note 542 (between “Offered to pay” and**  
10 **“effective at”; between “effective at” and “signaled they could”; between “could move to” and**  
11 **“and Google”).** This text contains confidential, non-public information regarding Google’s  
12 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
13 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
14 competitor or potential business partner unfair leverage in competing against or negotiating with  
15 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
16 Google’s developer partners and offer specific deal terms designed to undercut those offered by  
17 Google.

18           **458. Exhibit 52, Page 364, Paragraph 611 (between “Billing Services Markets of**  
19 **roughly” and “for the period August”; between “which I find to be approximately” and end of**  
20 **sentence).** This information reflects and is calculated from internal, non-public Google financial data.  
21 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
22 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
23 cause Google competitive harm by giving competitors insight into confidential Google financial  
24 information. Further, this information reflects sensitive, highly confidential characterizations by  
25 Google’s internal business teams that, if revealed, could be referenced by potential counterparties in  
26 negotiations with Google to gain an unfair advantage against Google.

27           **Google’s Motion to Exclude Opinions Offered by Hal Singer [Dkt. No. 487]**

**(Exhibit E1)**

459. **Page 4, Lines 24-27 (between “average basis -” and “for IAPs”; between “transactions),” and “for paid”; between “downloads, and” and “for subscriptions.”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**Google’s Motion to Exclude Opinions Offered by Hal Singer - Exhibit 1 [Dkt. No. 487-2]****(Exhibit E2)**

460. **Page 7, Paragraph 1, Note 4 (between “exceeds” and “percent”).** This text reflects revenue figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

461. **Page 8, Paragraph 3 (between “damages of” and “resulting”; between “damages of up to” and end of sentence).** This information is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information.



1           462.   **Page 20, Paragraph 20, Note 55 (between “GOOG-PLAY-010801568 at -570” and**  
2 **“GOOG-PLAY-001404176”)**. This text contains confidential, non-public information regarding a  
3 non-party developer, and implicates that non-party’s confidentiality interests, by revealing the nature  
4 of its business arrangements with Google. The non-party has a reasonable expectation that Google will  
5 maintain the confidentiality of contractual terms and confidential statements made during negotiations.  
6 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
7 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
8 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
9 competitors could use this non-party information to unfairly target Google’s developer partners.

10           463.   **Page 22, Paragraph 24, Note 68 (between “the developers” and “and”; between**  
11 **“and” and “decided not to”)**. This text contains confidential, non-public information regarding non-  
12 party developers, and implicates the non-parties’ confidentiality interests, by revealing the strategic  
13 reasoning behind the non-parties’ business decisions. The non-parties have a reasonable expectation  
14 that Google will maintain the confidentiality of such information. Further, disclosure of this non-public  
15 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
16 which, for example, could give a competitor or potential business partner unfair leverage in competing  
17 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
18 information to unfairly target Google’s developer partners.

19           464.   **Page 27, Paragraph 36 (between “yet” and “percent”)**. This information reveals  
20 Google's internal non-public calculations regarding the adoption of Google Play Billing. This data is  
21 not otherwise publicly reported by the company and its disclosure is likely to cause Google  
22 competitive harm and give its competitors an unfair advantage. Visibility into this data gives Google's  
23 competitors improper insight into the financial health of the company and success of the Play business  
24 model, which arguably gives Google's competitors an unfair advantage.

25           465.   **Page 29, Paragraph 40 (between “less than” and “percent”)**. This text describes  
26 confidential and non-public details about Google Play’s customer discounts. If those details were  
27  
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1 revealed to competitors and potential business counterparties, they could use that information to  
2 disadvantage Google.

3       466.   **Page 31, Paragraph 47 (between “OS for” and “of consumers”; between “OS of**  
4 **choice for” and “of those”; between “and for” and “of buyers”).** This information contains non-  
5 public data regarding Google’s competitive positioning and relative success among various tiers of  
6 consumers. This data informs Google’s confidential non-public internal strategic considerations  
7 related to attracting customers. This information has never been disclosed publicly. Disclosure of this  
8 information would adversely impact Google’s current competitive position by enabling Google’s  
9 competitors to mimic its confidential strategies in an effort to attract customers away from Google.

10       467.   **Page 31, Paragraph 47, Note 89 (between “Only” and “of purchasers”).** This  
11 information contains non-public data regarding Google’s competitive positioning and relative success  
12 among various tiers of consumers. This data informs Google’s confidential non-public internal  
13 strategic considerations related to attracting customers. This information has never been disclosed  
14 publicly. Disclosure of this information would adversely impact Google’s current competitive position  
15 by enabling Google’s competitors to mimic its confidential strategies in an effort to attract customers  
16 away from Google.

17       468.   **Page 32, Paragraph 49 (between “only” and “of U.S. Android users”).** This  
18 information contains non-public and confidential data regarding the frequency with which Android  
19 users switch to iOS. This information has never been disclosed publicly and the Google Play product  
20 team treats it as strictly confidential. If publicly revealed, this information could influence the  
21 competitive decision-making and business strategies employed by Google’s app store competitors, for  
22 example by influencing how those app stores market themselves to U.S. developers and how they  
23 distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing this  
24 data could influence the negotiating strategies and tactics employed by app developers and other  
25 current and prospective counterparties with which Google does or may transact business.

26       469.   **Page 32, Paragraph 49, Note 97 (between “only” and “of Android users”).** This  
27 information contains non-public and confidential data regarding the frequency with which Android  
28

1 users switch to iOS. This information has never been disclosed publicly and the Google Play product  
2 team treats it as strictly confidential. If publicly revealed, this information could influence the  
3 competitive decision-making and business strategies employed by Google’s app store competitors, for  
4 example by influencing how those app stores market themselves to U.S. developers and how they  
5 distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing this  
6 data could influence the negotiating strategies and tactics employed by app developers and other  
7 current and prospective counterparties with which Google does or may transact business.

8       **470. Page 33, Paragraph 51, Note 110 (between “GOOG-PLAY-002416488” and “data**  
9 **showing”).** This text contains confidential, non-public information regarding non-party developers,  
10 and implicates the non-party’s confidentiality interests. The non-party has a reasonable expectation  
11 that Google will maintain the confidentiality of its user data. The disclosure of the non-party’s identity  
12 in this context would significantly harm the non-party’s business. For example, competitors of the non-  
13 party could leverage this information to reap an unearned competitive advantage. They could exploit  
14 this information—that they otherwise would not have access to—to inform their own business  
15 strategies. To prevent these competitive harms from coming to fruition, the non-party proactively  
16 maintains the confidentiality of its user data, only disclosing it to a select group of individuals on an  
17 as-needed basis.

18       **471. Page 39, Paragraph 66 (between “recognizes that” and “Google’s business**  
19 **strategy”; between “documents” and “recognizing”; between “established one” and end of**  
20 **sentence).** This information contains non-public information regarding Google’s confidential non-  
21 public internal strategic considerations related to creating value for and attracting developers to the  
22 Google Play Store. This information has never been disclosed publicly. If publicly revealed, this  
23 information could influence the competitive decision-making and business strategies employed by  
24 Google’s app store competitors, for example by influencing how those app stores market themselves to  
25 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

26       **472. Page 43, Paragraph 78, Note 178 (between “specifies that” and “of”; between “of”**  
27 **and “When the contract”; between “in 2012” and “share of”; between “share of” and “was**

1 **reduced”**; between **“reduced to just”** and **“See GOOG-PLAY-001559464.R at -492.R”**; between  
 2 **“titled”** and **“Search Revenue Share Renewal”**). This text contains confidential, non-public  
 3 information regarding Google’s agreements with non-party developers. Disclosure of this non-public  
 4 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
 5 which, for example, could give a competitor or potential business partner unfair leverage in competing  
 6 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
 7 information to unfairly target Google’s developer partners and offer specific deal terms designed to  
 8 undercut those offered by Google.

9 473. **Page 45, Paragraph 84 (between “increased from” and “Part of this”; between**  
 10 **“increase in the” and “Margin / Device”; between “increases from” and “The remainder”;**  
 11 **between “increase in the” and “Margin / Device”; between “increases from” and “The**  
 12 **incremental”; between “at” and “This LTV analysis”).** This text reflects profit margin figures  
 13 calculated or derived from Google’s financial data which is non-public information, and if revealed to  
 14 competitors and potential business counterparties, could be used to disadvantage Google. For example,  
 15 if competitor platforms became aware of this information they could use it to inform their own  
 16 strategies, unfairly leveraging Google’s financial data to compete more effectively with Google Play.

17 474. **Page 46, Figure 6 (entire chart).** This chart reflects profit margin figures calculated or  
 18 derived from Google’s financial data which is non-public information, and if revealed to competitors  
 19 and potential business counterparties, could be used to disadvantage Google. For example, if  
 20 competitor platforms became aware of this information they could use it to inform their own strategies,  
 21 unfairly leveraging Google’s financial data to compete more effectively with Google Play.

22 475. **Page 46, Paragraph 85 (between “incremental” and “on Google services”).** This  
 23 text reflects gross margin figures calculated or derived from Google’s financial data which is non-  
 24 public information, and if revealed to competitors and potential business counterparties, could be used  
 25 to disadvantage Google. For example, if competitor platforms became aware of this information they  
 26 could use it to inform their own strategies, unfairly leveraging Google’s financial data to compete more  
 27 effectively with Google Play. Moreover, visibility into the trends in the data (i.e., figures across  
 28

multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

476. **Page 48, Paragraph 90 (between “to just” and “percent”; between “and just” and “percent”).** This information contains non-public and confidential data regarding the number of apps downloaded outside of Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of app installations outside of Google Play could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

477. **Page 48, Paragraph 90, Note 201 (between “approximately” and “of all Google Android”).** This information contains non-public and confidential data regarding the percentage of non-Play Store app installations attributable to sideloading. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of app installations attributable to sideloading could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

478. **Page 48, Paragraph 91, Note 203 (between “at” and “in 2019 and 2020”; between “The” and “statistic”; between “less than” and “of Apps”).** This information contains non-public and confidential data regarding the percentage of non-Play Store app installations attributable to sideloading. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive

1 decision-making and business strategies employed by Google’s app store competitors, for example by  
2 influencing how those app stores market themselves to U.S. developers and how they distinguish  
3 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of app  
4 installations attributable to sideloading could influence the negotiating strategies and tactics employed  
5 by app developers and other current and prospective counterparties with which Google does or may  
6 transact business.

7       479.   **Page 50, Paragraph 94, Note 208 (between “his time at” and “Id. at 101:21-**  
8 **102:14”).** The disclosure of this non-party’s highly confidential information would significantly harm  
9 the non-party’s business by revealing the strategic reasoning behind the non-party’s business decisions.  
10 Competitors could leverage this information to reap an unearned competitive advantage. They could  
11 exploit this information—that they otherwise would not have access to—to inform their own business  
12 strategies. To prevent these competitive harms from coming to fruition, this non-party proactively  
13 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
14 individuals on an as-needed basis.

15       480.   **Page 50, Paragraph 95, Note 209 (between “Id. at 321:19-323:1” and “Id. at 324:6-**  
16 **12”; between “for the developer” and end of sentence).** The disclosure of this non-party’s highly  
17 confidential information would significantly harm the non-party’s business by revealing the strategic  
18 reasoning behind the non-party’s business decisions. Competitors could leverage this information to  
19 reap an unearned competitive advantage. They could exploit this information—that they otherwise  
20 would not have access to—to inform their own business strategies. To prevent these competitive harms  
21 from coming to fruition, this non-party proactively maintains the confidentiality of its strategic  
22 information, only disclosing it to a select group of individuals on an as-needed basis.

23       481.   **Page 50, Paragraph 96 (between “increase from” and “See Table 16”).** This text  
24 contains non-public and confidential information relating to the consumer subsidy that would exist in a  
25 but-for world according to Plaintiffs' expert, which is derived from Google's highly confidential  
26 transactional data. If disclosed, this data point could be used by potential counterparties negotiating  
27 with Google as a benchmark, weakening Google's competitive position.

1           482.   **Page 50, Paragraph 96 (between “approximately” and “which is far above”;**  
 2 **between “subsidy of” and end of sentence).** This text contains non-public and confidential  
 3 information relating to the consumer subsidy that would exist in a but-for world according to Plaintiffs'  
 4 expert, which is derived from Google's highly confidential transactional data. If disclosed, this data  
 5 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
 6 Google's competitive position.

7           483.   **Page 52, Paragraph 98 (between “approximately” and “See Table 6”; between**  
 8 **“price of” and “multiplied”; between “take rate of” and end of sentence).** This text contains non-  
 9 public and confidential information relating to the transaction price that would exist in a but-for world  
 10 according to Plaintiffs' expert, which is derived from Google's highly confidential transactional data. If  
 11 disclosed, this data point could be used by potential counterparties negotiating with Google as a  
 12 benchmark, weakening Google's competitive position.

13           484.   **Page 52, Paragraph 98 (between “approximately” and “See Table 6”; between**  
 14 **“price of” and “multiplied”; between “take rate of” and end of sentence).** This text reveals  
 15 Google's internal non-public profit, revenue, and financial calculations regarding transaction prices and  
 16 Google's take rate on transactions. This data is not otherwise publicly reported by the company and its  
 17 disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage.  
 18 Google's competitors could improperly utilize this internal, non-public data to modify or augment their  
 19 business operations in an effort to compete unfairly against Google.

20           485.   **Page 52, Paragraph 98 (between “approximately” and “percent”; between “equal**  
 21 **to” and end of sentence).** This text reveals Google's internal non-public profit, revenue, and financial  
 22 calculations regarding Google's actual transaction prices, as well as the contentions of Plaintiffs'  
 23 expert regarding the transaction price that would exist in a but-for world which are derived from  
 24 Google's highly confidential transactional data. This data is not otherwise publicly reported by the  
 25 company and its disclosure is likely to cause Google competitive harm and give its competitors an  
 26 unfair advantage. Google's competitors could improperly utilize this internal, non-public data to  
 27 modify or augment their business operations in an effort to compete unfairly against Google.



1           486.   **Page 52, Paragraph 98, Note 218 (between “approximately” and end of sentence).**

2 This text reveals Google's internal financial data regarding its transaction prices. This data is not  
3 otherwise publicly reported by the company and its disclosure is likely to cause Google competitive  
4 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
5 internal, non-public data to modify or augment their business operations in an effort to compete  
6 unfairly against Google.

7           487.   **Page 54, Paragraph 105 (between “would amount to” and “of mobile gaming”;**  
8 **between “represented” and “of mobile games”).** This text contains information regarding Google’s  
9 confidential non-public internal strategic considerations related to the game-streaming market,  
10 including revenue projections and estimates calculated from Google’s internal non-public financial  
11 data. This information has never been disclosed publicly. If publicly revealed, this information could  
12 influence the competitive decision-making and business strategies employed by Google’s app store  
13 competitors, for example by influencing how those app stores market themselves to U.S. developers  
14 and how they distinguish themselves from Google Play in the eyes of U.S. developers.

15           488.   **Page 61, Paragraph 121, Note 283 (between “showing” and “percent of 2021”).**  
16 This text reveals Google's internal non-public financial calculations of Play Store revenue generated  
17 from apps and games compared to other sources. This financial information is not otherwise publicly  
18 reported by the company and its disclosure is likely to cause Google competitive harm and give its  
19 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
20 public data to modify or augment their business operations in an effort to compete unfairly against  
21 Google.

22           489.   **Page 65, Paragraph. 127 (between “over” and “percent of App”).** This text contains  
23 non-public and confidential data regarding the percentage of app installations and updates performed  
24 via the Play Store. This information has never been disclosed publicly and the Google Play product  
25 team treats it as strictly confidential. If publicly revealed, this information could influence the  
26 competitive decision-making and business strategies employed by Google’s app store competitors, for  
27 example by influencing how those app stores market themselves to U.S. developers and how they  
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distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of app installations and updates performed via Google Play could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

490. **Page 66, Table 1 (entire chart, except for the “Month” column).** This chart contains non-public and confidential data regarding the percentage of app installations and updates performed via the Play Store. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of app installations and updates performed via Google Play could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

491. **Page 66, Paragraph 128 (between “describe as” and “Although P2P”).** This text contains non-public information regarding Google’s confidential, internal strategic considerations related to methods of installing apps outside of the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by giving them insight into Google’s confidential strategic thinking with respect to app distribution and development.

492. **Page 66, Paragraph 128, Note 299 (between “where are installs coming from?...” and end of sentence).** This text contains non-public information regarding Google’s confidential, internal strategic considerations related to methods of installing apps outside of the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely

1 impact Google's current competitive position by giving them insight into Google's confidential  
2 strategic thinking with respect to app distribution and development.

3 493. **Page 67, Paragraph 130 (between "through the" and "also represented"; between**  
4 **"such as" and "have market shares").** This text contains confidential, non-public information  
5 regarding non-parties, and implicates the non-parties' confidentiality interests, by revealing the non-  
6 parties' respective shares of initial downloads on Android devices. The non-parties have a reasonable  
7 expectation that Google will maintain the confidentiality of such information. Further, disclosure of  
8 this non-public information is likely to result in competitive harm to Google, as it reveals Google's  
9 internal data and/or estimates regarding third party app stores' relative share of initial app downloads  
10 on Android devices. This provides insight into Google's strategic thinking, which could give a  
11 competitor or potential business partner unfair leverage in competing against or negotiating with  
12 Google.

13 494. **Page 67, Figure 10 (entire chart).** This chart contains confidential, non-public  
14 information regarding non-parties, and implicates the non-parties' confidentiality interests, by  
15 revealing the non-parties' respective shares of initial downloads on Android devices. The non-parties  
16 have a reasonable expectation that Google will maintain the confidentiality of such information.  
17 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
18 it reveals Google's internal data and/or estimates regarding third party app stores' relative share of  
19 initial app downloads on Android devices. This provides insight into Google's strategic decision-  
20 making, which could give a competitor or potential business partner unfair leverage in competing  
21 against or negotiating with Google.

22 495. **Page 69, Paragraph 133, Note 302 (between "Koh Dep. 323:3-23" and "didn't**  
23 **invest").** This text contains confidential, non-public information regarding a non-party developer, and  
24 implicates the non-party's confidentiality interests. The text reveals the identity and strategic decision-  
25 making of a Google business partner who is not party to this litigation. The disclosure of this non-  
26 party's strategic business considerations would significantly harm the non-party's business. For  
27 example, competitors could leverage this information to reap an unearned competitive advantage. They  
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1 could exploit this information—that they otherwise would not have access to—to inform their own  
2 business strategies. To prevent these competitive harms from coming to fruition, the non-party  
3 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
4 of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to  
5 result in competitive harm to Google, as it provides insight into the strategic decision-making of  
6 specific developers, which, for example, could give a competitor or potential business partner unfair  
7 leverage in competing against or negotiating with Google.

8       **496. Page 69, Paragraph 134 (between “and the” and “store was”).** This text contains  
9 confidential, non-public information regarding a non-party, and implicates the non-party’s  
10 confidentiality interests, by revealing the percentage of active Android devices on which the non-party  
11 was able to pre-load its app store. This provides insight into the commercial success and business  
12 outlook of the non-party. The non-party has a reasonable expectation that Google will maintain the  
13 confidentiality of such information. The disclosure of the non-party’s highly confidential information  
14 would significantly harm the non-party’s business. For example, competitors could leverage this  
15 information to reap an unearned competitive advantage. They could exploit this information—that they  
16 otherwise would not have access to—to inform their own business strategies. To prevent these  
17 competitive harms from coming to fruition, the non-party proactively maintains the confidentiality of  
18 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.  
19 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
20 it reveals Google’s internal data and/or estimates regarding the share of active Android devices with  
21 alternative app stores. This provides insight into Google’s strategic thinking, which could give a  
22 competitor or potential business partner unfair leverage in competing against or negotiating with  
23 Google.

24       **497. Page 69, Table 4 (all numbers under column “Amazon”; all numbers under**  
25 **column “LG”; all numbers under column “Galaxy”).** This chart contains confidential, non-public  
26 information regarding a non-party, and implicates the non-party’s confidentiality interests, by  
27 revealing the percentage of active Android devices on which the non-party was able to pre-load its app  
28

store. This provides insight into the commercial success and business outlook of the non-party. The non-party has a reasonable expectation that Google will maintain the confidentiality of such information. The disclosure of the non-party's highly confidential information would significantly harm the non-party's business. For example, competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the non-party proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal data and/or estimates regarding the share of active Android devices with alternative app stores. This provides insight into Google's strategic thinking, which could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

498. Page 70-71, Paragraph 138 (between “profit of” and “in 2019”; between “a” and “over the Play Store’s”; between “profit of” and “in 2018”; between “excluding ads” and “to”; between “to” and “in 2020”; between “in 2020, an” and “of”; between “of” and “from the prior year”; between “2020 was” and “and its operating”; between “margin was” and “A separate spreadsheet”; between “additional” and “on ads”; between “with” and “of those revenues”; between “of those revenues” and “In 2021”; between “gross profit margin was” and “its operating”; between “operating profit margin was” and “and its operating”; between “profit was” and “In 2021”; between “additional” and “on ads”; between “with” and “of those revenues (again)”; between “(again)” and “Google has projected”; between “income will” and “to”; between “to” and “by 2025”). This text reflects revenue, operating profit, and gross profit margin figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1           499.   Page 70, Paragraph 138, Note 315 (between “revenue of” and “in 2020”; between  
 2 “sales of” and “direct operating”; between “expenses of” and “and cost allocations of”; between  
 3 “and cost allocations of” and “These data”; between “revenue of” and “Similarly”; between  
 4 “direct costs is” and “and the 2020”; between “cost allocations is” and end of sentence). This text  
 5 reflects revenue, operating profit, and gross profit margin figures calculated or derived from Google's  
 6 financial data which is non-public information, and if revealed to competitors and potential business  
 7 counterparties, could be used to disadvantage Google. For example, if competitor platforms became  
 8 aware of this information they could use it to inform their own strategies, unfairly leveraging Google's  
 9 financial data to compete more effectively with Google Play.

10           500.   Page 70, Paragraph 138, Note 316 (between “(excluding ads) of” and “and gross”;  
 11 between “profit of” and “for gross”; between “margin of” and “The Play Store’s”; between  
 12 “profit was” and “in 2021”; between “margin of” and “percent”). This text reflects revenue,  
 13 operating profit, and gross profit margin figures calculated or derived from Google's financial data  
 14 which is non-public information, and if revealed to competitors and potential business counterparties,  
 15 could be used to disadvantage Google. For example, if competitor platforms became aware of this  
 16 information they could use it to inform their own strategies, unfairly leveraging Google's financial data  
 17 to compete more effectively with Google Play.

18           501.   Page 71, Paragraph 138, Note 317 (between “revenue of” and “in 2021”; between  
 19 “profit of” and “for a gross”; between “margin of” and “Total operating expenses”; between  
 20 “recorded at” and “yielding”; between “operating profit of” and “for an operating margin of”;  
 21 between “for an operating margin of” and end of sentence). This text reflects revenue, operating  
 22 profit, and gross profit margin figures calculated or derived from Google's financial data which is non-  
 23 public information, and if revealed to competitors and potential business counterparties, could be used  
 24 to disadvantage Google. For example, if competitor platforms became aware of this information they  
 25 could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more  
 26 effectively with Google Play.

1           502.   **Page 73, Paragraph 145, Note 333 (between “Explaining that” and “(emphasis in**  
 2 **original)”**). This information contains non-public and confidential estimates, information, and  
 3 strategic discussion regarding the percentage of developers who choose Google Play as a payment  
 4 provider. This information has never been disclosed publicly and the Google Play product team treats  
 5 it as strictly confidential. If publicly revealed, this information could influence the competitive  
 6 decision-making and business strategies employed by Google’s app store competitors, for example by  
 7 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 8 themselves from Google Play in the eyes of U.S. developers.

9           503.   **Page 74, Paragraph 147 (between “own billing infrastructure” and “Similar to”;**  
 10 **between “Similar to” and “Record evidence”; between “indicates that” and end of sentence).**  
 11 This text contains confidential, non-public information regarding a non-party developer, and implicates  
 12 the non-party’s confidentiality interests, by providing insight into the non-party’s strategic decision-  
 13 making. The non-party has a reasonable expectation that Google will maintain the confidentiality of  
 14 such information. The disclosure of the non-party’s highly confidential information would  
 15 significantly harm the non-party’s business. For example, its competitors could exploit this  
 16 information—that they otherwise would not have access to—to inform their own business strategies.  
 17 To prevent these competitive harms from coming to fruition, the non-party proactively maintains the  
 18 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
 19 needed basis. Further, disclosure of this non-public information is likely to result in competitive harm  
 20 to Google, as it reveals the strategic business considerations of developers, which, for example, could  
 21 give a competitor or potential business partner unfair leverage in competing against or negotiating with  
 22 Google.

23           504.   **Page 76, Paragraph 153, Note 358 (between “GOOG-PLAY-000259276” and “is**  
 24 **definitely”; between “Epic and” and “wanted to use”; between “suspected” and “would want**  
 25 **to”; between “to bring” and “on to our Billing”; between “including” and “interpret”).** This text  
 26 contains confidential, non-public information regarding non-party developers, and implicates the  
 27 developers’ confidentiality interests, by providing insight into the developers strategic decision-  
 28



making. The developers have a reasonable expectation that Google will maintain the confidentiality of such information. The disclosure of the developers' highly confidential information would significantly harm the developers' business. For example, their competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the developers proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals the strategic business considerations of developers, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

505. Page 77, Paragraph 154, Note 364 (between “Billing” and “Match”; between “Match” and “and others”; between “GOOG-PLAY-000258923 at -924” and “does not believe”; between “services like match” and “began as web”; between “summarizing” and “test”). This text contains confidential, non-public information regarding non-party developers, and implicates the developers' confidentiality interests, by providing insight into the developers strategic decision-making. The developers have a reasonable expectation that Google will maintain the confidentiality of such information. The disclosure of the developers' highly confidential information would significantly harm the developers' respective businesses. For example, their competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the developers proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals the strategic business considerations of developers, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

506. Page 80, Paragraph 162, Note 374 (between “survey found that” and “are from”; between “while” and “are implicit”; between “Play Store” and “responded affirmatively”;

1 **between “Id. at -584.” and “thought that information”).** This information contains non-public and  
2 confidential data regarding the browsing and purchasing patterns of Android users on Google Play.  
3 This information has never been disclosed publicly and the Google Play product team treats it as  
4 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
5 making and business strategies employed by Google’s app store competitors, for example by  
6 influencing how those app stores market themselves to U.S. developers and how they distinguish  
7 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of U.S.  
8 developers that distribute apps on Google Play could influence the negotiating strategies and tactics  
9 employed by app developers and other current and prospective counterparties with which Google does  
10 or may transact business.

11 507. **Page 80, Paragraph 164 (between “by roughly” and “implying that”; between “for**  
12 **one year” and end of sentence).** This information reflects Google’s internal financial calculations.  
13 Google spends significant resources compiling and maintaining the valuable, non-public data from  
14 which these calculations were derived. If revealed to competitors and potential business  
15 counterparties, these calculations could be used to disadvantage and cause Google competitive harm by  
16 giving competitors insight into confidential Google financial information. Further, this information  
17 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
18 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
19 advantage against Google.

20 508. **Page 80, Paragraph 164, Note 377 (between “will cost” and end of sentence).** This  
21 information reflects Google’s internal financial calculations. Google spends significant resources  
22 compiling and maintaining the valuable, non-public data from which these calculations were derived.  
23 If revealed to competitors and potential business counterparties, these calculations could be used to  
24 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
25 Google financial information. Further, this information reflects sensitive, highly confidential  
26 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
27 counterparties in negotiations with Google to gain an unfair advantage against Google.

509. **Page 81, Paragraph 165, Note 382 (between “regarding” and “enabling Google Play”).** This text contains confidential, non-public information regarding a non-party developer and reveals the identity of a Google business partner who is not party to this litigation. Disclosure of this information would implicate the developer’s confidentiality interests, as the developer has a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. The disclosure of the developer’s highly confidential information would significantly harm the developer’s business. For example, its competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the developer proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

510. **Page 81, Paragraph 165, Note 383 (between “signed by” and “etc.”; between “such as” and “signed more”; between “GOOG-PLAY-007271978” and “GOOG-PLAY-007272461”; between “GOOG-PLAY-007272461” and “GOOG-PLAY- 007317231”; between “GOOG-PLAY- 007317231” and “GOOG-PLAY-007317239”; between “GOOG-PLAY-007317239” and “GOOG-PLAY-009214128”; between “GOOG-PLAY-009214128” and end of sentence).** This text contains confidential, non-public information regarding non-party developers and reveals the identities of Google business partners who are not party to this litigation. Disclosure of this information would implicate the developers’ confidentiality interests, as the developers have a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. The disclosure of the developers’ highly confidential information would significantly harm the developers’ respective businesses. For example,

1 their competitors could leverage this information to reap an unearned competitive advantage. They  
2 could exploit this information—that they otherwise would not have access to—to inform their own  
3 business strategies. To prevent these competitive harms from coming to fruition, the developers  
4 proactively maintain the confidentiality of their strategic information, only disclosing it to a select  
5 group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely  
6 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
7 could give a competitor or potential business partner unfair leverage in competing against or  
8 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
9 unfairly target Google’s developer partners and offer specific deal terms designed to undercut those  
10 offered by Google.

11       511.   **Page 81, Paragraph 165, Note 384 (between “Addendum for the” and “Developer**  
12 **obligations”; between “GOOG-PLAY-007505091 (Apps Velocity Program Addendum for the”**  
13 **and end of sentence).** This text contains confidential, non-public information regarding non-party  
14 developers and reveals the identities of Google business partners who are not party to this litigation.  
15 Disclosure of this information would implicate the developers’ confidentiality interests, as the  
16 developers have a reasonable expectation that Google will maintain the confidentiality of contractual  
17 terms and confidential statements made during negotiations. The disclosure of the developers’ highly  
18 confidential information would significantly harm the developers’ respective businesses. For example,  
19 their competitors could leverage this information to reap an unearned competitive advantage. They  
20 could exploit this information—that they otherwise would not have access to—to inform their own  
21 business strategies. To prevent these competitive harms from coming to fruition, the developers  
22 proactively maintain the confidentiality of their strategic information, only disclosing it to a select  
23 group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely  
24 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
25 could give a competitor or potential business partner unfair leverage in competing against or  
26 negotiating with Google. Moreover, Google’s competitors could use this non-party information to

1 unfairly target Google's developer partners and offer specific deal terms designed to undercut those  
2 offered by Google.

3       512.   **Page 81-82, Paragraph 166 (between “provided a” and “take rate”).** This text  
4 contains confidential, non-public information regarding Google’s agreements with non-party  
5 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
6 as it reveals strategic decision-making which, for example, could give a competitor or potential  
7 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
8 competitors could use this non-party information to unfairly target Google's developer partners and  
9 offer specific deal terms designed to undercut those offered by Google.

10       513.   **Page 81, Paragraph 166, Note 385 (between “Agreement with” and “Eligibility”;**  
11 **between “such as the” and “and”; between “and” and “were provided with”; between “such as”**  
12 **and “GOOG-PLAY-007273682”).** This text contains confidential, non-public information regarding  
13 non-parties and reveals the identities of Google business partners who are not party to this litigation.  
14 Disclosure of this information would implicate the non-parties’ confidentiality interests, as the non-  
15 parties have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
16 and confidential statements made during negotiations. The disclosure of the non-parties’ highly  
17 confidential information would significantly harm the non-parties’ respective businesses. For example,  
18 their competitors could leverage this information to reap an unearned competitive advantage. They  
19 could exploit this information—that they otherwise would not have access to—to inform their own  
20 business strategies. To prevent these competitive harms from coming to fruition, the non-parties  
21 proactively maintain the confidentiality of their strategic information, only disclosing it to a select  
22 group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely  
23 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
24 could give a competitor or potential business partner unfair leverage in competing against or  
25 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
26 unfairly target Google's developer partners and offer specific deal terms designed to undercut those  
27 offered by Google.

514. **Page 82, Paragraph 166, Note 386 (between “Program Addendum with” and “GOOG-PLAY-007505116”; between “Program Addendum with” and “became the first”; between “March 2022” and “would be subject”; between “subject to a” and “take rate”; between “Google Play Billing and” and “if a user”; between “chooses” and end of sentence).** This text contains confidential, non-public information regarding non-party developers and reveals the identities of Google business partners who are not party to this litigation. Disclosure of this information would implicate the developers’ confidentiality interests, as the developers have a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. The disclosure of the developers’ highly confidential information would significantly harm the developers’ respective businesses. For example, their competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the developers proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners and offer specific deal terms designed to undercut those offered by Google.

515. **Page 82, Paragraph 167 (between “provided” and “The terms of”; between “contribution of” and “from Google in”; between “from Google in” and “Riot Games”; between “receiving” and “of support for”; between “of support for” and “content”; between “content and” and “in”; between “in” and “receiving a”; between “receiving a” and “in which Google”; between “agreed to” and end of sentence).** This text contains confidential, non-public information regarding non-party developers and reveals the identities of Google business partners who are not party to this litigation. Disclosure of this information would implicate the developers’ confidentiality interests, as the developers have a reasonable expectation that Google will maintain the confidentiality

1 of contractual terms and confidential statements made during negotiations. The disclosure of the  
2 developers' highly confidential information would significantly harm the developers' respective  
3 businesses. For example, their competitors could leverage this information to reap an unearned  
4 competitive advantage. They could exploit this information—that they otherwise would not have  
5 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
6 fruition, the developers proactively maintain the confidentiality of their strategic information, only  
7 disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-  
8 public information is likely to result in competitive harm to Google, as it reveals strategic decision-  
9 making which, for example, could give a competitor or potential business partner unfair leverage in  
10 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
11 party information to unfairly target Google's developer partners and offer specific deal terms designed  
12 to undercut those offered by Google.

13       516.   **Page 82, Paragraph 167, Note 387 (between “Distribution Agreement for the” and**  
14 **end of sentence).** This text contains confidential, non-public information regarding a non-party  
15 developer and reveals the identity of a Google business partner who is not party to this litigation.  
16 Disclosure of this information would implicate the developer's confidentiality interests, as the  
17 developer has a reasonable expectation that Google will maintain the confidentiality of contractual  
18 terms and confidential statements made during negotiations. The disclosure of the developer's highly  
19 confidential information would significantly harm the developer's business. For example, its  
20 competitors could leverage this information to reap an unearned competitive advantage. They could  
21 exploit this information—that they otherwise would not have access to—to inform their own business  
22 strategies. To prevent these competitive harms from coming to fruition, the developer proactively  
23 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
24 individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result  
25 in competitive harm to Google, as it reveals strategic decision-making which, for example, could give  
26 a competitor or potential business partner unfair leverage in competing against or negotiating with  
27 Google. Moreover, Google's competitors could use this non-party information to unfairly target



Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

517. **Page 82, Paragraph 168 (between “one document” and “is only one”; between “offered a” and “rev share”; between “share.’ A” and “executive testified”; between “Google and” and “have reached”; between “rate is” and “when the”; between “approximately” and “otherwise”; between “showing a” and “take rate”).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

518. **Page 82, Paragraph 168, Note 390 (between “See” and “Rough Dep.”; between “did” and “pay Google”; between “in the” and “app downloaded”; between “choices to use” and “for its payment”; between “commissions that” and “would pay”; between “of paying” and end of sentence).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

519. **Page 83, Paragraph 168, Note 391 (between “See” and “Rough Dep.”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of

1 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
2 decision-making, which, for example, could give a competitor or potential business partner unfair  
3 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
4 this non-party information to unfairly target Google's developer partners.

5       **520. Page 83, Paragraph 169 (between "For example, the" and "had total"; between**  
6 **"of" and "in 2021"; between "approximately" and "The vast majority"; between "2021, the" and**  
7 **"worldwide"; between "approximately" and "Even these estimates"; "given that the" and "In-**  
8 **App aftermarket"; "only about" and "percent of its").** This information reflects and is calculated  
9 from internal, non-public Google and a non-party's financial data. Google spends significant resources  
10 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
11 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
12 by giving competitors insight into confidential Google financial information. Further, The disclosure of  
13 the non-party's highly confidential information would significantly harm to the non-party's business.  
14 For example, the non-party app store's competitors could leverage this information to reap an unearned  
15 competitive advantage.

16       **521. Page 84, Figure 11 (entire chart).** This information reflects and is calculated from  
17 internal, non-public Google and a non-party's financial data. Google spends significant resources  
18 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
19 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
20 by giving competitors insight into confidential Google financial information. Further, The disclosure of  
21 the non-party's highly confidential information would significantly harm to the non-party's business.  
22 For example, the non-party app store's competitors could leverage this information to reap an unearned  
23 competitive advantage.

24       **522. Page 84, Paragraph 170 (between "smaller than" and "As seen"; between "Store**  
25 **are" and "of those").** This information reflects and is calculated from internal, non-public Google and  
26 a non-party's financial data. Google spends significant resources compiling and maintaining this  
27 valuable data, which is non-public, and if revealed to competitors and potential business  
28

1 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 2 competitors insight into confidential Google financial information. Further, The disclosure of the non-  
 3 party's highly confidential information would significantly harm to the non-party's business. For  
 4 example, the non-party app store's competitors could leverage this information to reap an unearned  
 5 competitive advantage.

6       **523. Page 85, Figure 12 (entire chart).** This information reflects and is calculated from  
 7 internal, non-public Google and a non-party's financial data, specifically consumer expenditure.  
 8 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
 9 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
 10 cause Google competitive harm by giving competitors insight into confidential Google financial  
 11 information. Further, The disclosure of the non-party's highly confidential information would  
 12 significantly harm to the non-party's business. For example, the non-party app store's competitors  
 13 could leverage this information to reap an unearned competitive advantage.

14       **524. Page 87, Paragraph 177 (between "Verizon with" and "percent of"; between**  
 15 **"Google retained" and "percent"; between "Verizon a" and "percent share"; between "AT&T"**  
 16 **and "of Gross"; between "sales, leaving" and "percent").** This text contains confidential, non-  
 17 public information regarding Google's agreements with non-party mobile carriers. These non-parties'  
 18 have a reasonable expectation that Google will maintain the confidentiality of specific contractual  
 19 terms and statements made during contract negotiations. Disclosure of this non-public information is  
 20 likely to result in competitive harm to Google, as it reveals strategic decision-making which, for  
 21 example, could give a competitor or potential business partner unfair leverage in competing against or  
 22 negotiating with Google.

23       **525. Page 87, Paragraph 177, Note 405 (between "carriers received" and "of revenue";**  
 24 **between "deals from" and "on DCB"; between "DCB and" and "on Credit"; between "Apps to"**  
 25 **and "and"; between "and" and "respectively").** This text contains confidential, non-public  
 26 information regarding Google's agreements with non-party carriers. Disclosure of this non-public  
 27 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
 28

1 which, for example, could give a competitor or potential business partner unfair leverage in competing  
2 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
3 information to unfairly target Google's carrier partners and offer specific deal terms designed to  
4 undercut those offered by Google.

5       **526. Page 88-89, Paragraph 179 (between "approximately" and "percent"; between**  
6 **"would have" and "its"; between "its" and "percent revenue").** This information reflects and is  
7 calculated from internal, non-public Google financial data. Google spends significant resources  
8 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
9 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
10 by giving competitors insight into confidential Google financial information. Further, this information  
11 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
12 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
13 advantage against Google.

14       **527. Page 89, Paragraph 179, Note 412 (between "calculated at" and "of consumer**  
15 **expenditures").** This text reflects marginal cost figures calculated or derived from Google's financial  
16 data which is non-public information, and if revealed to competitors and potential business  
17 counterparties, could be used to disadvantage Google. For example, if competitor platforms became  
18 aware of this information they could use it to inform their own strategies, unfairly leveraging Google's  
19 financial data to compete more effectively with Google Play.

20       **528. Page 94, Paragraph 193, Note 451 (between "July 1, 2020" and "Google").** This  
21 text contains confidential, non-public information regarding a non-party OEM and reveals the identity  
22 of a Google business partner who is not party to this litigation. Disclosure of this information would  
23 implicate the OEM's confidentiality interests, as the OEM has a reasonable expectation that Google  
24 will maintain the confidentiality of contractual terms and confidential statements made during  
25 negotiations. The disclosure of the OEM's highly confidential information would significantly harm  
26 the OEM's business. For example, its competitors could leverage this information to reap an unearned  
27 competitive advantage. They could exploit this information—that they otherwise would not have  
28

1 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
2 fruition, the OEM proactively maintains the confidentiality of its strategic information, only disclosing  
3 it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public  
4 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
5 which, for example, could give a competitor or potential business partner unfair leverage in competing  
6 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
7 information to unfairly target Google's OEM partners and offer specific deal terms designed to  
8 undercut those offered by Google.

9       **529. Page 94, Paragraph 194, Note 452 (between “2018” and “MADA”; between “2017”**  
10 **and “MADA”; between “2011” and “MADA”).** This text contains confidential, non-public  
11 information regarding non-party OEMs and reveals the identities of Google business partners who are  
12 not party to this litigation. Disclosure of this information would implicate the OEMs’ confidentiality  
13 interests, as the OEMs have a reasonable expectation that Google will maintain the confidentiality of  
14 contractual terms and confidential statements made during negotiations. The disclosure of the OEMs’  
15 highly confidential information would significantly harm the developers’ respective businesses. For  
16 example, their competitors could leverage this information to reap an unearned competitive advantage.  
17 They could exploit this information—that they otherwise would not have access to—to inform their  
18 own business strategies. To prevent these competitive harms from coming to fruition, the OEMs  
19 proactively maintain the confidentiality of their strategic information, only disclosing it to a select  
20 group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely  
21 to result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
22 could give a competitor or potential business partner unfair leverage in competing against or  
23 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
24 unfairly target Google's OEM partners and offer specific deal terms designed to undercut those offered  
25 by Google.

26       **530. Page 96, Paragraph 197 (between “Samsung” and “And in questioning”; between**  
27 **“employee wrote” and end of sentence).** This text contains confidential, non-public information

1 regarding non-party OEMs and reveals the identities of Google business partners who are not party to  
 2 this litigation. Disclosure of this information would implicate the OEMs' confidentiality interests, as  
 3 the OEMs have a reasonable expectation that Google will maintain the confidentiality of statements  
 4 made during negotiations. Further, disclosure of this non-public information is likely to result in  
 5 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
 6 competitor or potential business partner unfair leverage in competing against or negotiating with  
 7 Google. If publicly revealed, this information could influence the competitive decision-making and  
 8 business strategies employed by Google's app store competitors, for example by influencing how those  
 9 app stores market themselves to OEMs and/or. developers and how they distinguish themselves from  
 10 Google Play in the eyes of developers.

11       **531. Page 100, Paragraph 209 (between "OEMs on a" and "if the OEM"; between**  
 12 **"nearly" and "in 2020"; between "up to" and "in 2023"; between "stated goal was" and end of**  
 13 **sentence).** This information contains non-public and confidential information regarding agreements  
 14 reached by Google with OEMs, including Google's projected expenditure on such agreements and the  
 15 underlying business rationale behind such agreements. This information has never been disclosed  
 16 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 17 information could influence the competitive decision-making and business strategies employed by  
 18 Google's competitors, for example by influencing how those competitors market themselves to OEMs  
 19 and developers and how they distinguish themselves from Google Play in the eyes of OEMs  
 20 developers. In addition, revealing such information could influence the negotiating strategies and  
 21 tactics employed by OEMs and other current and prospective counterparties with which Google does  
 22 or may transact business.

23       **532. Page 100-101, Paragraph 210 (between "at least" and "OEMs"; between**  
 24 **"projections for" and "OEMs"; between "Google anticipated" and "Premier Tier"; between**  
 25 **"January 2021" and "devices sold").** This information contains non-public and confidential  
 26 information regarding agreements reached with OEMs, including the precise number of OEMs with  
 27 whom Google had entered agreements and the number of devices subject to those agreements. This  
 28

information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s competitors, for example by influencing how those competitors market themselves to OEMs and developers and how they distinguish themselves from Google Play in the eyes of OEMs developers. In addition, revealing such information could influence the negotiating strategies and tactics employed by OEMs and other current and prospective counterparties with which Google does or may transact business.

533. Page 100, Paragraph 210, Note 497 (between “GOOG-PLAY-000620210” and “GOOG-PLAY-000620638”; between “GOOG-PLAY-000620638” and “GOOG-PLAY-005706338”; between “GOOG-PLAY-005706338” and “GOOG-PLAY-008111867”; between “GOOG-PLAY-008111867” and “GOOG-PLAY-001745614”; between “GOOG-PLAY-001745614” and “GOOG-PLAY-000416708”; between “GOOG-PLAY-000416708” and “GOOG-PLAY-000620282”; between “GOOG-PLAY-000620282” and “GOOG-PLAY-000620442”; between “GOOG-PLAY-000620442” and “GOOGPLAY-000620131”; between “GOOGPLAY-000620131” and “GOOG-PLAY-005706436”; between “GOOG-PLAY-005706436” and “GOOG-PLAY-005706676”; between “GOOG-PLAY-005706676” and “GOOG-PLAY-007038477”; between “GOOG-PLAY-007038477” and “GOOG-PLAY-007038511”; between “GOOG-PLAY-007038511” and “GOOG-PLAY-000620478”; between “GOOG-PLAY-000620478” and “GOOG-PLAY-005706728”; between “GOOG-PLAY-005706728” and “GOOG-PLAY-000416651”; between “GOOG-PLAY-000416651” and end of sentence). This text contains confidential, non-public information regarding non-party OEMs and reveals the identities of Google business partners who are not party to this litigation. Disclosure of this information would implicate the OEMs’ confidentiality interests, as the OEMs have a reasonable expectation that Google will maintain the confidentiality of contractual terms and confidential statements made during negotiations. The disclosure of the OEMs’ highly confidential information would significantly harm the developers’ respective businesses. For example, their competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent



these competitive harms from coming to fruition, the OEMs proactively maintain the confidentiality of their strategic information, only disclosing it to a select group of individuals on an as-needed basis. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it provides insight into Google's strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's OEM partners and offer specific deal terms designed to undercut those offered by Google.

534. **Page 101, Paragraph 210, Note 500 (between "Id. at -173.R." and "premier"; between "tier for" and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's OEM partners and offer specific deal terms designed to undercut those offered by Google.

535. **Page 102, Paragraph 214, Note 511 (between "(Co-marketing fund agreement)" and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

536. **Page 103, Paragraph 215, Note 515 (between "offer Samsung" and "Id. at -809."; between "In return" and "only App stores"; between "home screen" and "Id. at -810—811.").** This information contains non-public and confidential information regarding negotiations with Samsung, including specific deal terms. This information has never been disclosed publicly and the

Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's competitors, for example by influencing how those competitors market themselves to OEMs and how they distinguish themselves from Google Play in the eyes of OEMs. In addition, revealing details of Google's negotiations could influence the negotiating strategies and tactics employed by OEMs and other current and prospective counterparties with which Google does or may transact business.

537. **Page 103-104, Paragraph 217 (between "internally as the" and "requirement"; between "developers to" and "Google's documents").** This information contains non-public and confidential information regarding deal terms negotiated with developers. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing these details could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

538. **Page 103, Paragraph 217, Note 519 (between "impact of" and "requirement").** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

539. **Page 104, Paragraph 218 (between "imposed" and "provisions"; between "developers" and "when distributing"; between "deal with" and "Such provisions").** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google,

1 as it reveals strategic decision-making which, for example, could give a competitor or potential  
2 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
3 competitors could use this non-party information to unfairly target Google's developer partners and  
4 offer specific deal terms designed to undercut those offered by Google.

5 540. **Page 105, Paragraph 222, Note 537 (between "Sessions/User metric at just" and**  
6 **"percent"; between "App/User metric at just" and "percent").** This information contains non-  
7 public and confidential data regarding user engagement on Google Play. This information has never  
8 been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
9 revealed, this information could influence the competitive decision-making and business strategies  
10 employed by Google's app store competitors, for example by influencing how those app stores market  
11 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
12 U.S. developers. In addition, revealing the number of U.S. developers that distribute apps on Google  
13 Play could influence the negotiating strategies and tactics employed by app developers and other  
14 current and prospective counterparties with which Google does or may transact business.

15 541. **Page 106, Paragraph 223 (between "major game release" and "confirmed";**  
16 **between "estimated the" and "(across all Apps)"; between "or between" and "of the amount**  
17 **consumers").** This information contains non-public and confidential data regarding consumer  
18 spending on major gaming apps on Google Play. This information has never been disclosed publicly  
19 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
20 could influence the competitive decision-making and business strategies employed by Google's app  
21 store competitors, for example by influencing how those app stores market themselves to U.S.  
22 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In  
23 addition, the disclosure of data about consumer spending on Google Play could influence the  
24 negotiating strategies and tactics employed by app developers and other current and prospective  
25 counterparties with which Google does or may transact business. Furthermore, the text contains  
26 information about certain non-parties, the disclosure of which would significantly harm the non-  
27  
28

parties' business by allowing the nonparties' competitors to potentially exploit this information—that they otherwise would not have access to—to inform their own business strategies.

542. **Page 106-107, Paragraph 225 (between “one year” and “game developers”; between “holdouts” and “a popular gaming”; between “to Google, if” and “were to migrate”; between “impact would be” and “in spend”; between “risk” of” and “defection”; between “offer to” and “that involved”; between “Google had offered” and “a”; between “a” and “reinvestment”; between “Shortly thereafter” and “signed a”).** This text contains non-public and confidential data regarding the number of developers signing Games Velocity Program Agreements, as well as the projected business impact of a particular developer removing its app from the Google Play Store and specific deal terms negotiated with that developer. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing this information could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

543. **Page 106, Paragraph 224, Note 541 (between “Play reinvests” and “See also GOOG-PLAY-004119228.R at -237.R”; between “Play takes” and “a developer”; between “dollars towards” and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1           **544. Page 106, Paragraph 225, Note 544 (between “Id.” and “is therefore considering”).**

2 This text contains confidential, non-public information regarding a non-party developer and implicates  
 3 the non-party’s confidentiality interests, by revealing the identity of Google business partners who are  
 4 not party to this litigation. The non-party developer has a reasonable expectation that Google will  
 5 maintain the confidentiality of statements it made to Google during negotiations and/or business  
 6 discussions. Further, the disclosure of the developer’s highly confidential information would  
 7 significantly harm the developer, by providing insight into the developer’s strategic business  
 8 considerations. Competitors could exploit this information—that they otherwise would not have  
 9 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
 10 fruition, the non-party developer proactively maintains the confidentiality of its strategic information,  
 11 only disclosing it to a select group of individuals on an as-needed basis. Moreover, disclosure of this  
 12 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 13 decision-making, which, for example, could give a competitor or potential business partner unfair  
 14 leverage in competing against or negotiating with Google.

15           **545. Page 107, Paragraph 226 (between “resulted in” and “(2019-2022)”;**  
 16 **“driving an” and “dollars”).** This information reflects and is calculated from internal, non-public  
 17 Google financial data. Google spends significant resources compiling and maintaining this valuable  
 18 data, which is non-public, and if revealed to competitors and potential business counterparties, could  
 19 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
 20 confidential Google financial information. Further, this information reflects sensitive, highly  
 21 confidential characterizations by Google’s internal business teams that, if revealed, could be referenced  
 22 by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

23           **546. Page 108, Paragraph 228 (between “estimate that the” and “game developers”;**  
 24 **between “accounted for” and “of all game-related”;**  
 25 **between “revenue and” and “of all App”;**  
 26 **between “exclusively selling” and “of the most”).** This text contains information regarding the  
 27 number of developers participating in the Games Velocity Program, and the percentage of game-  
 28 related app revenue attributable to those developers. The information reflects and is calculated from

1 internal, non-public Google financial data. Google spends significant resources compiling and  
2 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
3 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
4 competitors insight into confidential Google financial information. Further, this information reflects  
5 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
6 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
7 against Google.

8       **547. Page 107, Paragraph 225, Note 546 (between “As” and “has influence”; between**  
9 **“up to” and “of Play revenue”; between “of Play revenue” and “would have a”; between**  
10 **“margin risk of” and “for Play”; between “risk” of” and “defection”; between “percentage of”**  
11 **and “and to”; between “and to” and “a percentage of subscription”; between “spend into” and**  
12 **end of sentence”).** This information contains non-public and confidential information regarding  
13 Google’s internal analysis of a specific developer’s ability to distribute outside of Google Play, as well  
14 as Google’s consideration of specific deal terms which could be offered to that developer. This  
15 information has never been disclosed publicly and the Google Play product team treats it as strictly  
16 confidential. If publicly revealed, this information could influence the competitive decision-making  
17 and business strategies employed by Google’s app store competitors, for example by influencing how  
18 those app stores market themselves to U.S. developers and how they distinguish themselves from  
19 Google Play in the eyes of U.S. developers. In addition, revealing such information could influence the  
20 negotiating strategies and tactics employed by app developers and other current and prospective  
21 counterparties with which Google does or may transact business.

22       **548. Page 108, Paragraph 228, Note 556 (between “GOOG-PLAY-000237798” and “is**  
23 **excluded from”; between “GOOG-PLAY-000001976” and “is therefore considering”).** This text  
24 contains confidential, non-public information regarding a non-party developer and implicates the non-  
25 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
26 to this litigation. The non-party developer has a reasonable expectation that Google will maintain the  
27 confidentiality of statements it made to Google during negotiations and/or business discussions.

Further, the disclosure of the developer’s highly confidential information would significantly harm the developer, by providing insight into the developer’s strategic business considerations. Competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the non-party developer proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Moreover, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

549. **Page 108, Paragraph 228, Note 557 (between “with” and “excluded, supra”).** This text contains confidential, non-public information regarding a non-party developer and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation. The non-party developer has a reasonable expectation that Google will maintain the confidentiality of the existence and nature of its agreements with Google. Further, the disclosure of the developer’s highly confidential information would significantly harm the developer. Competitors could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the non-party developer proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Moreover, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Further, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

550. **Page 108, Paragraph 230, Note 560 (between “Hug” and “GOOG-PLAY-011269238 at -260”; between “whether the” and “and other developer”).** This text contains information regarding Google’s confidential, internal analyses of the revenue risks posed by competitor activity. This information reflects and is calculated from internal, non-public Google



1 financial data. Google spends significant resources compiling and maintaining this valuable data,  
 2 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
 3 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 4 Google financial information. Further, this information reflects sensitive, highly confidential  
 5 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
 6 counterparties in negotiations with Google to gain an unfair advantage against Google.

7       **551. Page 109-110, Paragraph 233 (between “relationship with” and “indicate”;**  
 8 **between “meeting with” and “Google”; between “whitelist” and “in exchange for”; between “in**  
 9 **exchange for” and “agreeing to limit”; between “suggest that if” and “appeared”; between “pull**  
 10 **the” and “app from”; between “suggests that” and “and Google”; between “effect that” and**  
 11 **“would not launch”; between “August 2020” and “executive”; between “executive” and “wrote**  
 12 **in”; between “[W]e” and “have also made”; between “with the” and “installer”).** This text  
 13 contains confidential, non-public information regarding non-party developers, and implicates the non-  
 14 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
 15 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
 16 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
 17 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 18 decision-making, which, for example, could give a competitor or potential business partner unfair  
 19 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 20 this non-party information to unfairly target Google’s developer partners.

21       **552. Page 109, Paragraph 232, Note 567 (between “same meeting” and “disclosed”;**  
 22 **between “ads in the” and “GOOG-PLAY-004698100.R at -102.R”).** This text contains  
 23 confidential, non-public information regarding non-party developers, and implicates the non-party’s  
 24 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
 25 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
 26 statements made to Google during negotiations. Further, disclosure of this non-public information is  
 27 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 28

example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

553. Page 109, Paragraph 233, Note 568 (between **"\*update\*" and "apps only";** between **"white-listing" and "for purposes";** between **"in exchange for" and "limiting"**). This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

554. Page 110, Paragraph 233, Note 572 (between start of footnote and **"\_000015003";** between **"-004" and "See also";** between **"Kochikar to" and end of sentence;** between **"agreement with" and "Rasanen";** between **"remember.\*)" and "Dep. 212";** between **"asked if" and "limited";** between **"own apps," and "Lagerling Dep.;"** between **"100:3-16" and "and did not 'have a lot of";** between **"related to" and "because at that time";** between **"discussing" and "direct app installs";** between **"with respect to" and "experimenting";** between **"from its" and "A. I don't recall";** between **"finding out from" and "So I can tell")**). This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair

1 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
2 this non-party information to unfairly target Google’s developer partners.

3       555.    **Page 110, Paragraph 234 (between “seek and obtain” and “commitment”; between**  
4 **“preload” and “with installation”; between “Google gave” and “waivers”; between “waivers on”**  
5 **and “continuing to refrain”).** This text contains confidential, non-public information regarding non-  
6 party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of  
7 Google business partners who are not party to this litigation, and who has a reasonable expectation that  
8 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
9 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
10 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
11 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
12 Google’s competitors could use this non-party information to unfairly target Google’s developer  
13 partners.

14       556.    **Page 110-111, Paragraph 235 (between “Google offered” and “a technology”;**  
15 **between “apps shown in” and “Ms. Rasanen”; between “to make” and “want to cease”; between**  
16 **“via any” and “apps distributed”; between “while offering” and “an opportunity”; between**  
17 **“When” and “refused”; between “go back to” and “and propose”; between “propose a” and**  
18 **“trial agreement”).** This text contains confidential, non-public information regarding non-party  
19 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
20 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
21 will maintain the confidentiality of contractual terms and its own confidential statements made during  
22 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
23 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
24 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
25 Google’s competitors could use this non-party information to unfairly target Google’s developer  
26 partners.

557. **Page 110, Paragraph 233, Note 571 (between “understanding that” and “only had”; between “agreement with” and “regarding”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

558. **Page 110, Paragraph 234, Note 573 (between “certain point did” and “and Google”; between “regarding” and “install permissions”; between “A. Yes.” and “has agreed”; between “Purnima Kochikar to” and “stating”; between “assurance that” and “has deprioritized/stopped”; between “asking” and “to “confirm that”; between “to “confirm that” and “is not pursue”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

559. **Page 111, Paragraph 236 (between “offered Alley-Oop to” and “at significant cost”; between “to motivate” and “to avoid”; between “compared” and “competing”; between “give” and “something they want”; between “essentially handing” and “billions”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-

party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

560. **Page 111-112, Paragraph 237 (between "attempt to slow" and "progress"; between "negotiating to provide" and "with"; between "with" and "on a trial basis"; between "threaten" and "with termination"; between "trial period." and "used"; between "indicates that" and "currently uses").** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.

561. **Page 111, Paragraph 235, Note 576 (between "distribution via any" and "apps distributed"; between "while offering" and "an opportunity"; between "to test" and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or

1 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 2 Google's competitors could use this non-party information to unfairly target Google's developer  
 3 partners.

4       **562. Page 111, Paragraph 235, Note 577 (between "go back to" and "and propose";**  
 5 **between "propose a" and "trial agreement"; between "apps that use" and "GOOG-PLAY-**  
 6 **006367390"; between "explaining that" and "is "[w]illing to"; between "continue testing" and**  
 7 **"Rasanen Dep. 204:9-16"; between "make clear to" and "that at the conclusion"; between "apps**  
 8 **that use" and "A. I believe I did").** This text contains confidential, non-public information regarding  
 9 a non-party developer, and implicates the non-party's confidentiality interests, by revealing its identity  
 10 as a Google business partner. The non-party has a reasonable expectation that Google will maintain  
 11 the confidentiality of contractual terms and confidential statements it made to Google during  
 12 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 13 to Google, as it reveals Google's strategic decision-making, which, for example, could give a  
 14 competitor or potential business partner unfair leverage in competing against or negotiating with  
 15 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 16 Google's developer partners.

17       **563. Page 111, Paragraph 237, Note 582 (between "signal to" and "that our intent").**  
 18 This text contains confidential, non-public information regarding a non-party developer, and implicates  
 19 the non-party's confidentiality interests, by revealing its identity as a Google business partner. The  
 20 non-party has a reasonable expectation that Google will maintain the confidentiality of contractual  
 21 terms and confidential statements it made to Google during negotiations. Further, disclosure of this  
 22 non-public information is likely to result in competitive harm to Google, as it reveals Google's  
 23 strategic decision-making, which, for example, could give a competitor or potential business partner  
 24 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
 25 could use this non-party information to unfairly target Google's developer partners.

26       **564. Page 111, Paragraph 237, Note 583 (between "Google and" and "entered into";**  
 27 **between "agreement permitting" and "to test").** This text contains confidential, non-public  
 28

1 information regarding a non-party developer, and implicates the non-party's confidentiality interests,  
2 by revealing its identity as a Google business partner. The non-party has a reasonable expectation that  
3 Google will maintain the confidentiality of contractual terms and confidential statements it made to  
4 Google during negotiations. Further, disclosure of this non-public information is likely to result in  
5 competitive harm to Google, as it reveals Google's strategic decision-making, which, for example,  
6 could give a competitor or potential business partner unfair leverage in competing against or  
7 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
8 unfairly target Google's developer partners.

9 **565. Page 112, Paragraph 237, Note 584 (between "know if" and "currently uses").**

10 This text contains confidential, non-public information regarding a non-party developer, and implicates  
11 the non-party's confidentiality interests, by revealing its identity as a Google business partner. The  
12 non-party has a reasonable expectation that Google will maintain the confidentiality of contractual  
13 terms and confidential statements it made to Google during negotiations. Further, disclosure of this  
14 non-public information is likely to result in competitive harm to Google, as it reveals Google's  
15 strategic decision-making, which, for example, could give a competitor or potential business partner  
16 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
17 could use this non-party information to unfairly target Google's developer partners.

18 **566. Page 112, Paragraph 240, Note 588 (between "such as Chrome" and "Id. (showing,**  
19 **e.g., Chrome"; between "Chrome with a" and "malware install"; between "compared with" and**  
20 **end of sentence).** This text contains Google's non-public and confidential data regarding device  
21 security and malware installation rates. This information has never been disclosed publicly and the  
22 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
23 influence the competitive decision-making and business strategies employed by Google's app store  
24 competitors, for example by influencing how those app stores market themselves to both developers  
25 and OEMs, as well as how they distinguish themselves from Google in the eyes of developers and  
26 OEMs. In addition, revealing this data could influence the negotiating strategies and tactics employed



1 by OEMs and other current and prospective counterparties with which Google does or may transact  
2 business.

3       **567. Page 115, Paragraph 249 (between “rivals to” and “Economists recognize”).** This  
4 text contains non-public and confidential information regarding Google’s strategic business  
5 considerations. This information has never been disclosed publicly and the Google Play product team  
6 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
7 decision-making and business strategies employed by Google’s app store competitors, for example by  
8 influencing how those app stores market themselves to U.S. developers and how they distinguish  
9 themselves from Google Play in the eyes of U.S. developers. In addition, revealing Google’s  
10 competitive strategy could influence the negotiation tactics employed by app developers and other  
11 current and prospective counterparties with which Google does or may transact business.

12       **568. Page 116, Figure 15 (entire chart).** This chart contains non-public and confidential  
13 information regarding Google’s strategic business considerations. This information has never been  
14 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
15 revealed, this information could influence the competitive decision-making and business strategies  
16 employed by Google’s app store competitors, for example by influencing how those app stores market  
17 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
18 U.S. developers. In addition, revealing Google’s competitive strategy could influence the negotiation  
19 tactics employed by app developers and other current and prospective counterparties with which  
20 Google does or may transact business.

21       **569. Page 118-119, Paragraph 257 (between “cost Google” and “revenue”; between**  
22 **“revenue” and “margin impact”; between “in three years” and “revenue”; between “revenue”**  
23 **and “margin risk”; between “payments at only” and “through 2022”).** This information reflects  
24 and is calculated from internal, non-public Google financial data. Google spends significant resources  
25 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
26 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
27 by giving competitors insight into confidential Google financial information. Further, this information  
28

1 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
2 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
3 advantage against Google.

4       **570. Page 119, Paragraph 258 (between “in 2020, he assessed that” and end of**  
5 **sentence.)** This text contains non-public and confidential information regarding Google’s own internal  
6 assessment of Project Hug. Google’s internal analyses and assessments have never been disclosed  
7 publicly, and the Google Play product team treats this information as strictly confidential. If publicly  
8 revealed, this information could influence the competitive decision-making and business strategies  
9 employed by Google’s app store competitors, for example by influencing how those app stores market  
10 themselves to developers and how they distinguish themselves from Google Play in the eyes of  
11 developers. In addition, revealing Google’s confidential evaluations, assessments, or analyses could  
12 influence the negotiation tactics employed by current and prospective counterparties with which  
13 Google does or may transact business.

14       **571. Page 119, Paragraph 259 (between “reinvest” and end of sentence.)** This text  
15 contains confidential, non-public information regarding Google’s agreements with non-party  
16 developers, including information that reflects or is derived from internal, non-public Google financial  
17 data. Disclosure of this non-public information is likely to result in competitive harm to Google, as it  
18 reveals Google’s strategic decision-making which, for example, could give a competitor or potential  
19 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
20 competitors could use this non-party information to unfairly target Google's developer partners and  
21 offer specific deal terms designed to undercut those offered by Google.

22       **572. Page 119, Paragraph 257, Note 611 (between “projected would constitute” and “of**  
23 **overall”).** This information reflects and is calculated from internal, non-public Google financial data.  
24 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
25 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
26 cause Google competitive harm by giving competitors insight into confidential Google financial  
27 information. Further, this information reflects sensitive, highly confidential characterizations by  
28

Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

573. **Page 119, Paragraph 259, Note 616 (between “developers who represented” and end of sentence).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers, including information that reflects or is derived from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google’s strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google.

574. **Page 120, Paragraph 262 (between “would involve” and end of sentence”).** This text reveals Google’s confidential, non-public strategic thinking and business considerations with respect to third party payment processors. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers. In addition, revealing Google’s strategic thought process could influence the negotiation tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

575. **Page 122, Paragraph 267 (between “large developer” and “resisted Google’s efforts”; between “Nevertheless” and “took steps”; between “refused to allow” and “a major mobile game”; between “developer with” and “in annual consumer expenditures;” between “refused to allow” and “to offer users”; between “prevented Korean developer” and “with”; between “with” and “in annual consumer spend”).** The disclosure of these non-party developers’ highly confidential information would significantly harm the developers’ respective businesses. For

1 example, their respective competitors could exploit this information—that they otherwise would not  
2 have access to—to inform their own business strategies. To prevent these competitive harms from  
3 coming to fruition, the developers proactively maintain the confidentiality of their strategic  
4 information, only disclosing it to a select group of individuals on an as-needed basis.

5 576. **Page 125, Figure 16 (title, between “Per User” and end of title; entire graph).** The  
6 disclosure of this non-party developer’s highly confidential information would significantly harm the  
7 developer’s business. For example, the developer’s competitors could exploit this information—that  
8 they otherwise would not have access to—to inform their own business strategies. To prevent these  
9 competitive harms from coming to fruition, the developer proactively maintains the confidentiality of  
10 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

11 577. **Page 125, Figure 17 (title, between “Per User” and end of title; entire graph).** The  
12 disclosure of this non-party developer’s highly confidential information would significantly harm the  
13 developer’s business. For example, the developer’s competitors could exploit this information—that  
14 they otherwise would not have access to—to inform their own business strategies. To prevent these  
15 competitive harms from coming to fruition, the developer proactively maintains the confidentiality of  
16 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

17 578. **Page 126, Figure 18 (title, between “Per User” and end of title; entire graph).** The  
18 disclosure of this non-party developer’s highly confidential information would significantly harm the  
19 developer’s business. For example, the developer’s competitors could exploit this information—that  
20 they otherwise would not have access to—to inform their own business strategies. To prevent these  
21 competitive harms from coming to fruition, the developer proactively maintains the confidentiality of  
22 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

23 579. **Page 129, Paragraph 282, Note 660 (between “indicate that” and “of consumer**  
24 **spend”).** This information reflects and is calculated from internal, non-public Google financial data.  
25 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
26 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
27 cause Google competitive harm by giving competitors insight into confidential Google financial  
28

1 information. Further, this information reflects sensitive, highly confidential characterizations by  
2 Google's internal business teams that, if revealed, could be referenced by potential counterparties in  
3 negotiations with Google to gain an unfair advantage against Google.

4       **580. Page 130, Paragraph 285 (between “alternative payment options” and end of**  
5 **sentence).** This text contains Google’s internal, confidential assessments and characterizations of  
6 developers’ ability to provide alternative payment options. This information has never been disclosed  
7 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
8 information could influence the competitive decision-making and business strategies employed by  
9 Google’s app store competitors, for example by influencing how those app stores market themselves to  
10 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.  
11 In addition, revealing such information could influence the negotiating strategies and tactics employed  
12 by app developers and other current and prospective counterparties with which Google does or may  
13 transact business.

14       **581. Page 130, Paragraph 285, Note 667 (between “GOOG-PLAY-007755618 at 5619”**  
15 **and end of sentence).** This text contains Google’s internal, confidential assessments and  
16 characterizations of developers’ ability to provide alternative payment options. This information has  
17 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
18 publicly revealed, this information could influence the competitive decision-making and business  
19 strategies employed by Google’s app store competitors, for example by influencing how those app  
20 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
21 the eyes of U.S. developers. In addition, revealing such information could influence the negotiating  
22 strategies and tactics employed by app developers and other current and prospective counterparties  
23 with which Google does or may transact business.

24       **582. Page 131, Paragraph 289, Note 671 (between “in excess of” and “of consumer**  
25 **expenditures”).** This text contains non-public, confidential information regarding service fees and  
26 consumer expenditures on Google Play, which reflects and is calculated from Google’s internal, non-  
27 public financial data. Google spends significant resources compiling and maintaining this valuable  
28

data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, if publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to developers and how they distinguish themselves from Google Play in the eyes of developers. In addition, revealing the number of U.S. developers that distribute apps on Google Play could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

583. **Page 137, Paragraph 304 (between “approximately” and “percent of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

584. **Page 137, Paragraph 304, Note 683 (between “to be” and “percent of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

585. **Page 140, Paragraph 305 (between “take rate of” and “percent”; between “observed value of” and “percent”; between “Android App Distribution Market is” and “down from”; between “observed price of” and “net of”; between “consumers of” and “per paid App”; between “equal to” and “which demonstrates impact”; between “damages of” and “equal to”;**

1 **between “equal to” and “paid App”).** This information reflects and is calculated from internal, non-  
 2 public Google financial data. It includes non-public and confidential information relating to the take  
 3 rate that would exist in a but-for world according to Plaintiffs' expert, which is derived from Google's  
 4 highly confidential transactional data. Google spends significant resources compiling and maintaining  
 5 this valuable data, which is non-public, and if revealed to competitors and potential business  
 6 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 7 competitors insight into confidential Google financial information. Further, this information could be  
 8 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
 9 Google.

10 586. **Page 141, Table 6 (all numbers under column “Value”; text below the table,**  
 11 **between “8/16/2016-1/31/2017” and “I calculated”; text below the table, between “I summed the”**  
 12 **and “fields from the App”).** This table reflects data that is calculated from internal, non-public  
 13 Google financial data. It includes non-public and confidential information relating to the take rate that  
 14 would exist in a but-for world according to Plaintiffs' expert, which is derived from Google's highly  
 15 confidential transactional data. Google spends significant resources compiling and maintaining this  
 16 valuable data, which is non-public, and if revealed to competitors and potential business  
 17 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 18 competitors insight into confidential Google financial information. Further, this information could be  
 19 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
 20 Google.

21 587. **Page 148, Paragraph 318 (between “platform model of” and “percent”; between**  
 22 **“15 percent” and “offered by”; between “billing options (such as” and “and others”).** This  
 23 information reflects and is calculated from internal, non-public Google financial data. It includes non-  
 24 public and confidential information relating to the take rate that would exist in a but-for world  
 25 according to Plaintiffs' expert, which is derived from Google's highly confidential transactional data.  
 26 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
 27 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
 28



1 cause Google competitive harm by giving competitors insight into confidential Google financial  
2 information. Further, this text contains confidential, non-public information regarding non-party  
3 developers, revealing the identity of specific Google business partners who are not party to this  
4 litigation. Those non-parties have a reasonable expectation that Google will maintain the  
5 confidentiality of the existence and nature of any contractual terms.

6       **588. Page 148, Paragraph 318, Note 729 (between “Google offered a” and “percent”;**  
7 **between “developers such as” and “and others”; between “take rates of” and “see GOOG-**  
8 **PLAY-000442329 at -345—346”; between “GOOG-PLAY-004717237 and” and “see**  
9 **GOOGLAY-000338849.R at -888.R”).** This text contains confidential, non-public information  
10 regarding Google’s agreements with non-party developers, including the identity of specific Google  
11 business partners who are not party to this litigation. Those non-parties have a reasonable expectation  
12 that Google will maintain the confidentiality of contractual terms and statements made during  
13 negotiations. The disclosure of the developers’ highly confidential information would significantly  
14 harm their respective businesses. For example, their competitors could exploit this information—that  
15 they otherwise would not have access to—to inform their own business strategies. Further, disclosure  
16 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
17 decision-making which, for example, could give a competitor or potential business partner unfair  
18 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
19 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
20 designed to undercut those offered by Google.

21       **589. Page 151, Paragraph 323 (between “processing at just” and “percent”; between**  
22 **“costs came to” and “percent”).** This information reflects and is calculated from internal, non-public  
23 Google financial data. Google spends significant resources compiling and maintaining this valuable  
24 data, which is non-public, and if revealed to competitors and potential business counterparties, could  
25 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
26 confidential Google financial information. Further, this information could be referenced by potential  
27 counterparties in negotiations with Google to gain an unfair advantage against Google.

1           **590. Page 151-152, Paragraph 324 (between “costs came to” and “percent”; between**  
 2 **“estimated at” and “percent”; between “marginal costs” and “percent of revenues”).** This  
 3 information reflects and is calculated from internal, non-public Google financial data. Google spends  
 4 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 5 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 6 Google competitive harm by giving competitors insight into confidential Google financial information.  
 7 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 8 gain an unfair advantage against Google.

9           **591. Page 151, Paragraph 323, Note 739 (between “Google’s average” and “percent”;**  
 10 **between “costs are” and “for 2,300”; between “5,000 developers, and” and “for the vast**  
 11 **majority”).** This information reflects and is calculated from internal, non-public Google financial  
 12 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
 13 public, and if revealed to competitors and potential business counterparties, could be used to  
 14 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 15 Google financial information. Further, this information reflects sensitive, highly confidential  
 16 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
 17 counterparties in negotiations with Google to gain an unfair advantage against Google.

18           **592. Page 151, Paragraph 323, Note 740 (between “blended rate of” and “percent”).**  
 19 This information reflects and is calculated from internal, non-public Google financial data. Google  
 20 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
 21 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 22 Google competitive harm by giving competitors insight into confidential Google financial information.  
 23 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 24 gain an unfair advantage against Google.

25           **593. Page 154, Paragraph 330 (between “came to” and “between mid-August”; between**  
 26 **“collected” and “in U.S. commissions”; between “actual world of” and “percent”; between**  
 27 **“volume was” and “implying”; between “transaction of” and “Google received”; between**  
 28

1 **“Google received” and “per transaction”; between “estimated at” and “percent”; between**  
 2 **“consumer price, or” and “per transaction”; between “cost of” and “percent”; between**  
 3 **“elasticity is” and “By equation”; between “elasticity is” and “The values of”).** This information  
 4 reflects and is calculated from internal, non-public Google financial data. It includes Plaintiffs’  
 5 expert’s calculations of the take rate that would exist in a but-for world according to Plaintiffs’ expert,  
 6 which Plaintiffs’ expert derived from Google’s highly confidential transactional data. Google spends  
 7 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 8 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 9 Google competitive harm by giving competitors insight into confidential Google financial information.  
 10 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 11 gain an unfair advantage against Google.

12 594. **Page 155, Table 8 (all numbers under column “Value”; column “Source/Notes,**  
 13 **row [7], between “equal to” and “of consumer expenditure”).** This information reflects and is  
 14 calculated from internal, non-public Google financial data. It includes Plaintiffs’ expert’s calculations  
 15 of the take rate that would exist in a but-for world according to Plaintiffs’ expert, which Plaintiffs’  
 16 expert derived from Google’s highly confidential transactional data. Google spends significant  
 17 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
 18 competitors and potential business counterparties, could be used to disadvantage and cause Google  
 19 competitive harm by giving competitors insight into confidential Google financial information.  
 20 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 21 gain an unfair advantage against Google.

22 595. **Page 156-157, Paragraph 332 (between “calculated at” and “which implies”;**  
 23 **between “margin of” and “percent, as seen in Table 8”; between “fall to” and “per transaction”;**  
 24 **between “savings of” and “per transaction”; between “come to” and “over the time period”;**  
 25 **between “fall to” and “percent”; between “margin would be” and “percent”).** This information  
 26 reflects and is calculated from internal, non-public Google financial data. It includes Plaintiffs’  
 27 expert’s calculations of prices and margins that would exist in a but-for world according to Plaintiffs’  
 28

expert, which Plaintiffs' expert derived from Google's highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

596. **Page 164, Figure 19 (entire chart).** This chart contains Google's non-public and confidential analyses of developers' expected reactions to potential business decisions that Google could make. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing Google's expectations regarding developer reactions to potential business decisions could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

597. **Page 164-165, Paragraph 344 (between "third row displays" and "in the "Option" column"; between "base rate of" and "for Google's payment"; between "decreases from" and "the greater are"; between "there is" and "so the final column"; between "final column shows" and end of sentence).** This text reveals Google's non-public and confidential analyses of developers' expected reactions to potential business decisions that Google could make relating to processing fees. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing Google's expectations regarding developer reactions to potential business decisions could influence the

1 negotiating strategies and tactics employed by app developers and other current and prospective  
2 counterparties with which Google does or may transact business.

3 598. Page 167, Paragraph 349, Note 811 (between “no more than” and “of users”;  
4 between “(2020) stating” and “As explained below”). This information reflects and is calculated  
5 from internal, non-public Google financial data. Google spends significant resources compiling and  
6 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
7 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
8 competitors insight into confidential Google financial information. Further, this information reflects  
9 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
10 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
11 against Google.

12 599. Page 180, Paragraph 366, Note 865 (between “(No. 3:20-cv-05761-JD)” and “Only  
13 recently”; between “take rate of approximately” and “percent”). This text contains confidential,  
14 non-public information regarding Google’s agreements with a non-party developer. Disclosure of this  
15 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
16 decision-making which, for example, could give a competitor or potential business partner unfair  
17 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
18 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
19 designed to undercut those offered by Google. Further, the disclosure of this non-party developer’s  
20 highly confidential information would significantly harm its business. For example, its competitors  
21 could exploit this information—that they otherwise would not have access to—to inform their own  
22 business strategies. To prevent these competitive harms from coming to fruition, the developer  
23 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
24 of individuals on an as-needed basis.

25 600. Page 183, Paragraph 369, Note 877 (between “subscription offerings” and “and (2)  
26 that”; between “and (2) that” and “had one of”; between “one of the” and “ADAP agreements”).  
27 This text contains confidential, non-public information regarding Google’s agreements with non-party  
28

1 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
 2 as it reveals strategic decision-making which, for example, could give a competitor or potential  
 3 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 4 competitors could use this non-party information to unfairly target Google's developer partners and  
 5 offer specific deal terms designed to undercut those offered by Google.

6       **601. Page 186, Paragraph 375 (between “program to reach” and “and develop**  
 7 **additional ways”; between “additional ways for” and “to participate”; between “to achieve “ and**  
 8 **“enrolled members”).** This text contains Google's non-public and confidential business strategy  
 9 regarding Play Points. This information has never been disclosed publicly and the Google Play product  
 10 team treats it as strictly confidential. If publicly revealed, this information could influence the  
 11 competitive decision-making and business strategies employed by Google's app store competitors, for  
 12 example by influencing how those app stores market themselves to U.S. developers and how they  
 13 distinguish themselves from Google Play in the eyes of U.S. developers.

14       **602. Page 186, Paragraph 377 (between “ONE Store's” and “Google also noted”;**  
 15 **between “enrolling” and “upon launch”; between “approximately” and “in South Korea”).** This  
 16 information contains non-public and confidential information regarding Google's strategy with respect  
 17 to Play Points, including information calculated or derived from internal, non-public Google financial  
 18 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
 19 public, and if revealed to competitors and potential business counterparties, could be used to  
 20 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 21 Google financial information. This information has never been disclosed publicly and the Google Play  
 22 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
 23 negotiating strategies and tactics employed by app developers and other current and prospective  
 24 counterparties with which Google does or may transact business.

25       **603. Page 187, Paragraph 378 (between “to do with” and “a holdout on”; between**  
 26 **“Project Hug” and “wanted a reduced”; between “One was to” and “Another was to”; between**  
 27 **“Another was to” and “A third option”; between “third option was to” and “Under this third**  
 28

1 **approach”; between “We should let” and “know that”; between “proposed by” and “Google**  
2 **cared”; between “was willing to” and end of sentence).** This text contains confidential, non-public  
3 information regarding a non-party developer, and implicates the developer’s confidentiality interests  
4 by purporting to reveal the developer’s confidential statements made during negotiations. Further,  
5 disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
6 strategic decision-making, which, for example, could give a competitor or potential business partner  
7 unfair leverage in competing against or negotiating with Google.

8       604. **Page 187, Paragraph 379 (between “mobile carriers” and “percentage”; between**  
9 **take rate (or” and “percent”).** This text contains confidential, non-public information regarding  
10 Google’s agreements with mobile carriers. Disclosure of this non-public information is likely to result  
11 in competitive harm to Google, as it reveals strategic decision-making which, for example, could give  
12 a competitor or potential business partner unfair leverage in competing against or negotiating with  
13 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
14 Google’s mobile carrier partners and offer specific deal terms designed to undercut those offered by  
15 Google.

16       605. **Page 187, Paragraph 381 (between “consumers, as” and “of U.S. consumers”;**  
17 **between “in the program and” and “of U.S. consumers”; between “That only” and “of U.S.**  
18 **consumers”; between “that only” and “of those who participated”).** This text contains Google’s  
19 non-public and confidential data regarding consumer participation in Play Points. This information has  
20 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
21 publicly revealed, this information could influence the competitive decision-making and business  
22 strategies employed by Google’s app store competitors, for example by influencing how those app  
23 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
24 the eyes of U.S. developers. In addition, revealing such could influence the negotiating strategies and  
25 tactics employed by app developers and other current and prospective counterparties with which  
26 Google does or may transact business.



1           606.   **Page 187, Paragraph 381, Note 911 (between “Equal to” and end of sentence).** This  
2 text contains Google’s non-public and confidential data regarding consumer participation in Play  
3 Points. This information has never been disclosed publicly and the Google Play product team treats it  
4 as strictly confidential. If publicly revealed, this information could influence the competitive decision-  
5 making and business strategies employed by Google’s app store competitors, for example by  
6 influencing how those app stores market themselves to U.S. developers and how they distinguish  
7 themselves from Google Play in the eyes of U.S. developers. In addition, revealing such could  
8 influence the negotiating strategies and tactics employed by app developers and other current and  
9 prospective counterparties with which Google does or may transact business.

10           607.   **Page 188, Paragraph 384 (between “average value of” and “percent”).** This text  
11 contains non-public and confidential information relating to Plaintiffs’ expert’s calculations of the take  
12 rate that would exist in a but-for world according to Plaintiffs' expert, which is derived from Google's  
13 highly confidential transactional data. If disclosed, this data point could be used by potential  
14 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

15           608.   **Page 189-190, Paragraph 386 (between “equal to” and “of consumer**  
16 **expenditures”).** This information reflects and is calculated from internal, non-public Google financial  
17 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
18 public, and if revealed to competitors and potential business counterparties, could be used to  
19 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
20 Google financial information. Further, this information could be referenced by potential counterparties  
21 in negotiations with Google to gain an unfair advantage against Google.

22           609.   **Page 190, Paragraph 386 (between “value of” and “in the monopoly setting”;**  
23 **between “Equation (V.11) to” and “in the competitive setting”; between “arrive at” and “using**  
24 **the relation between”).** This information reflects and is calculated from internal, non-public Google  
25 financial data. Google spends significant resources compiling and maintaining this valuable data,  
26 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
27 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
28

Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

610. **Page 190, Paragraph 386, Note 920 (between “changes from” and “in the monopoly setting”; between “Equation (V.11)) to” and “See, e.g., Landes & Posner”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

611. **Page 191, Table 16 (all numbers under column “Value”).** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to Plaintiffs’ expert’s calculations of take rates, prices and margins that would exist in a but-for world according to Plaintiffs’ expert, which are derived from Google’s highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

612. **Page 191-192, Paragraph 387 (between “an average of” and “per transaction”; between “approximately” and “percent of”; between “downloads in is” and “down from”; between “price of” and “net of”; between “consumers of” and “and aggregate damages”; between “damages of” and “as a result”).** This text contains non-public and confidential information relating to Plaintiffs’ expert’s calculations of the take rates, prices and margins that would exist in a but-for world according to Plaintiffs’ expert, which are derived from Google’s highly confidential transactional data. If disclosed, this data point could be used by potential counterparties negotiating with Google as a benchmark, weakening Google’s competitive position.

613. **Page 191, Paragraph 387, Note 921 (between “Equal to the” and “divided by”; between “product price of” and end of sentence).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this sensitive, highly confidential information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

614. **Page 192, Paragraph 390 (between “excess of” and “of consumer expenditures”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this sensitive, highly confidential information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

615. **Page 192, Paragraph 387, Note 922 (between “Equal to” and end of sentence).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this sensitive, highly confidential information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

616. **Page 194, Paragraph 395 (between “Android App Distribution Market was” and “and the average”; between “In-App Content was” and “According to”; between “Android App Distribution Market would be” and “According to”; between “In-App Aftermarket would be” and end of sentence.)** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed take rates that would exist in a but-for

1 world according to Plaintiffs' expert's calculations, which are derived from Google's highly  
2 confidential transactional data. Google spends significant resources compiling and maintaining this  
3 valuable data, which is non-public, and if revealed to competitors and potential business  
4 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
5 competitors insight into confidential Google financial information. Further, this information could be  
6 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
7 Google.

8       **617. Page 194, Paragraph 396 (between “decline from” and “in the actual world”;**  
9 **between “actual world to” and “per transaction”; between “total savings of” and “per**  
10 **transaction”; between “benefit because” and “percent”).** This information reflects and is  
11 calculated from internal, non-public Google financial data. It includes information relating to the  
12 supposed take rates and prices that would exist in a but-for world according to Plaintiffs' expert's  
13 calculations, which are derived from Google's highly confidential transactional data. Google spends  
14 significant resources compiling and maintaining this valuable data, which is non-public, and if  
15 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
16 Google competitive harm by giving competitors insight into confidential Google financial information.  
17 Further, this information could be referenced by potential counterparties in negotiations with Google to  
18 gain an unfair advantage against Google.

19       **618. Page 194, Paragraph 397 (between “elasticity of” and “shown in Table 8”; between**  
20 **“demand increases by” and “percent”; between “demand by” and “percent”).** This information  
21 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
22 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
23 competitors and potential business counterparties, could be used to disadvantage and cause Google  
24 competitive harm by giving competitors insight into confidential Google financial information.  
25 Further, this information could be referenced by potential counterparties in negotiations with Google to  
26 gain an unfair advantage against Google.

1           619.   **Page 194-195, Paragraph 398 (between “elasticity of” and “in Table 8”; between**  
2 **“approximately” and “in the but-for world”).** This information reflects and is calculated from  
3 internal, non-public Google financial data. It includes information relating to the supposed output that  
4 would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from  
5 Google's highly confidential transactional data. Google spends significant resources compiling and  
6 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
7 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
8 competitors insight into confidential Google financial information. Further, this information could be  
9 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
10 Google.

11           620.   **Page 195, Paragraph 398, Note 933 (between “approximately” and “driven by a**  
12 **decrease”; between “approximately” and “equal to”; between “approximately” and “driven by**  
13 **the increase”; between “take rate to” and “percent”).** This information reflects and is calculated  
14 from internal, non-public Google financial data. It includes information relating to the supposed  
15 output and/or take rates that would exist in a but-for world according to Plaintiffs' expert's  
16 calculations, which are derived from Google's highly confidential transactional data. Google spends  
17 significant resources compiling and maintaining this valuable data, which is non-public, and if  
18 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
19 Google competitive harm by giving competitors insight into confidential Google financial information.  
20 Further, this information could be referenced by potential counterparties in negotiations with Google to  
21 gain an unfair advantage against Google.

22           621.   **Page 197, Paragraph 402 (between “earned” and “in the sale”).** This information  
23 reveals Google's internal non-public revenue calculations. This data is not otherwise publicly reported  
24 by the company and its disclosure is likely to cause Google competitive harm and give its competitors  
25 an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to  
26 modify or augment their business operations in an effort to compete unfairly against Google.  
27 Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's  
28

competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

622. **Page 203, Table 17 (all numbers under column “% of all Units Sold”; all numbers under column “% of all Consumer Expenditures”).** This table reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

623. **Page 203, Table 18 (all numbers under column “Android App Distribution Market (Table 6)”; all numbers under column “In-App Aftermarket (Table 8)”; all numbers under column “Aggregate”).** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed prices that would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

624. **Page 203, Paragraph 415 (between “Market come to” and “and aggregate”; between “In-App Aftermarket come to” and end of sentence.)** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed prices that would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and

1 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 2 by giving competitors insight into confidential Google financial information. Further, this information  
 3 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 4 against Google.

5       **625. Page 204, Table 19 (all numbers under column “Discount Model (Table 16)”;** all  
 6 **numbers under column “Single Take Rate Model (Table A4)”**). This information reflects and is  
 7 calculated from internal, non-public Google financial data. It includes information relating to the  
 8 supposed take rates that would exist in a but-for world according to Plaintiffs' expert's calculations,  
 9 which are derived from Google's highly confidential transactional data. Google spends significant  
 10 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
 11 competitors and potential business counterparties, could be used to disadvantage and cause Google  
 12 competitive harm by giving competitors insight into confidential Google financial information.  
 13 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 14 gain an unfair advantage against Google.

15       **626. Page 205, Paragraph 420 (between “damages of” and “Table 21”; between**  
 16 **“significantly lower” and “because”**). This information reflects and is calculated from internal, non-  
 17 public Google financial data. Google spends significant resources compiling and maintaining this  
 18 valuable data, which is non-public, and if revealed to competitors and potential business  
 19 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
 20 competitors insight into confidential Google financial information. Further, this information could be  
 21 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
 22 Google.

23       **627. Page 206, Table 21 (last column of figures)**. This information reflects and is  
 24 calculated from internal, non-public Google and a non-party app store's financial data. Google spends  
 25 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 26 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 27 Google competitive harm by giving competitors insight into confidential Google financial information.



Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

628. **Page 206, Table 22 (all three columns below “Time Period” and “Total”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

629. **Page 209, Table 23 (all numbers under column “Actual Take Rate”; all numbers under column “But-For Take Rate”; all numbers under column “But-For Expenditure”; all numbers under column “CM Damages”; all numbers under column “CM Overcharge (%)”).** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed take rates that would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

630. **Page 209, Paragraph 429 (between “actual take rate of” and “a but-for take rate of”; between “but-for take rate of” and “and a passthrough rate of”; between “passthrough rate of” and “percent”; between “but-for expenditures are” and “This yields”; between “damages of” and “for each \$10”; between “damages would be” and “of expenditures”; between “of expenditures” and end of sentence).** This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed take rates that would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from Google's

highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

631. Page 210, Table 24 (all numbers under column “Actual Take Rate”; all numbers under column “But-For Take Rate”; all numbers under column “But-For Expenditure”; all numbers under column “CM Damages”; all numbers under column “CM Overcharge (%)”).

This information reflects and is calculated from internal, non-public Google financial data. It includes information relating to the supposed take rates that would exist in a but-for world according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential transactional data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

632. Page 262-263, Paragraph 442 (between “approximately” and “percent of”). This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

633. Page 264, Paragraph 444 (between “price is” and “down from”; between “price of” and “net of”; between “damages of” and “for the U.S.”; between “shift from” and “in the

1 **monopoly setting”; between “Equation (V.3)) to” and “in the competitive setting”).** This  
 2 information reflects and is calculated from internal, non-public Google financial data. It includes  
 3 information relating to the supposed prices that would exist in a but-for world according to Plaintiffs'  
 4 expert’s calculations, which are derived from Google's highly confidential transactional data. Google  
 5 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
 6 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 7 Google competitive harm by giving competitors insight into confidential Google financial information.  
 8 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 9 gain an unfair advantage against Google.

10 634. **Page 265, Table A4 (all numbers under column “Value”).** This information reflects  
 11 and is calculated from internal, non-public Google financial data. It includes information relating to  
 12 the supposed take rates and prices that would exist in a but-for world according to Plaintiffs' expert’s  
 13 calculations, which are derived from Google's highly confidential transactional data. Google spends  
 14 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 15 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 16 Google competitive harm by giving competitors insight into confidential Google financial information.  
 17 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 18 gain an unfair advantage against Google.

19 635. **Page 266, Paragraph 445 (between “increase to” and “per transaction”; between**  
 20 **“up from” and “per transaction”; between “rate is” and “down from”; between “down from”**  
 21 **and “in the actual world”; between “Class of” and end of sentence).** This information reflects and  
 22 is calculated from internal, non-public Google financial data. It includes information relating to the  
 23 supposed take rates that would exist in a but-for world according to Plaintiffs' expert’s calculations,  
 24 which are derived from Google's highly confidential transactional data. Google spends significant  
 25 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
 26 competitors and potential business counterparties, could be used to disadvantage and cause Google  
 27 competitive harm by giving competitors insight into confidential Google financial information.

1 Further, this information could be referenced by potential counterparties in negotiations with Google to  
2 gain an unfair advantage against Google.

3       **636. Page 267, Table A5 (all numbers under column “Value”).** This information reflects  
4 and is calculated from internal, non-public Google financial data. It includes information relating to  
5 the supposed take rates and prices that would exist in a but-for world according to Plaintiffs' expert's  
6 calculations, which are derived from Google's highly confidential transactional data. Google spends  
7 significant resources compiling and maintaining this valuable data, which is non-public, and if  
8 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
9 Google competitive harm by giving competitors insight into confidential Google financial information.  
10 Further, this information could be referenced by potential counterparties in negotiations with Google to  
11 gain an unfair advantage against Google.

12       **637. Page 268, Table A5 continued (all numbers immediately to the left of the word**  
13 **“Calculated” in each row).** This information reflects and is calculated from internal, non-public  
14 Google financial data. It includes information relating to the supposed take rates that would exist in a  
15 but-for world according to Plaintiffs' expert's calculations, which are derived from Google's highly  
16 confidential transactional data. Google spends significant resources compiling and maintaining this  
17 valuable data, which is non-public, and if revealed to competitors and potential business  
18 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
19 competitors insight into confidential Google financial information. Further, this information could be  
20 referenced by potential counterparties in negotiations with Google to gain an unfair advantage against  
21 Google.

22       **638. Page 269, Table A6 (entire chart).** This information reflects and is calculated from  
23 internal, non-public Google financial data. It includes information relating to the supposed prices, take  
24 rates, etc. that would exist in a but-for world according to Plaintiffs' expert's calculations, which are  
25 derived from Google's highly confidential transactional data. Google spends significant resources  
26 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
27 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
28

1 by giving competitors insight into confidential Google financial information. Further, this information  
 2 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
 3 against Google.

4       **639. Page 270, Table A6 continued (entire chart).** This information reflects and is  
 5 calculated from internal, non-public Google financial data. It includes information relating to the  
 6 supposed prices, take rates, etc. that would exist in a but-for world according to Plaintiffs' expert's  
 7 calculations, which are derived from Google's highly confidential transactional data. Google spends  
 8 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 9 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
 10 Google competitive harm by giving competitors insight into confidential Google financial information.  
 11 Further, this information could be referenced by potential counterparties in negotiations with Google to  
 12 gain an unfair advantage against Google.

13       **640. Page 271, Appendix 6 (all numbers under column "OLS Price Coefficient"; all**  
 14 **numbers under column "IV Price Coefficient"; text below table, between "comprised of" and**  
 15 **"Fixed effects").** This information reflects and is calculated from internal, non-public Google  
 16 financial data. Google spends significant resources compiling and maintaining this valuable data,  
 17 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
 18 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 19 Google financial information. Further, this information could be referenced by potential counterparties  
 20 in negotiations with Google to gain an unfair advantage against Google.

21       **641. Page 273, Appendix 7 (between "less than" and end of sentence).** This information  
 22 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
 23 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
 24 competitors and potential business counterparties, could be used to disadvantage and cause Google  
 25 competitive harm by giving competitors insight into confidential Google financial information.  
 26 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
 27  
 28

business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

**Google’s Motion to Exclude Opinions Offered by Hal Singer - Exhibit 2 [Dkt. No. 487-3]  
(Exhibit E3)**

642. **Page 13, Paragraph 10.o (between “upon was” and end of sentence).** This text contains non-public information regarding Google’s internal assessment of its business model and the value it generates for developers. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google, or could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

643. **Page 13, Paragraph 10.q (between “up to” and end of sentence).** This text reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. For example, Google's competitors could gain insight into Google's data by reverse engineering these figures and calculations, unfairly tailoring their own business strategy at Google’s expense.

644. **Page 13, Paragraph 10.r (between “up to” and “and consumer”; between “be up to” and end of sentence).** This text reflects and is calculated from internal, non-public Google financial data and data relating to Google’s Play Points reward program, including regarding the value of subsidy provided. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers.

645. **Page 23, Paragraph 32, Note 7 (between “July 3, 2021” and “of U.S.”; between “\$0.99 for” and “of U.S.”; between “\$1.99 for” and “of the transactions”; between “\$4.99 for”**

1 **and “of the transactions”;** between “\$9.99 for” and “of the transactions”; between “at ‘99’ for”  
 2 **and “of the transactions”).** This text reflects the proportion of consumer app transactions subject to  
 3 price points ending in “.99” and is calculated from Google’s internal, confidential financial data. If  
 4 publicly revealed, this specific information could influence the competitive pricing, decision-making,  
 5 and business strategies employed by Google’s app store competitors, for example by influencing how  
 6 those app stores market themselves to U.S. developers and how they distinguish themselves from  
 7 Google Play in the eyes of U.S. developers.

8 646. **Page 27, Paragraph 38 (between “fee rates for” and “the top paid”).** This text  
 9 reflects non-public and confidential information regarding the identity of a specific non-party  
 10 developer and developer-specific information derived from Google’s transactional data. The developer  
 11 identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality  
 12 of data relating to its app on Google Play. Revealing that data would harm Google’s relationship with  
 13 this developer (and potentially others), jeopardizing Google’s future business opportunities with them.

14 647. **Page 27, Paragraph 38, Note 13 (between “account for” and “of the total”).** This  
 15 text reveals the portion of total consumer spend represented by the top 100 paid apps experiencing a  
 16 service fee reduction after July 1, 2021 for the given time period. It reflects and is calculated from  
 17 Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information  
 18 about the degree of concentration of consumer spend on Google Play, which could be used by Google  
 19 Play’s app store competitors to inform commercial strategy and competition decision-making in an  
 20 effort to attract developers away from Google.

21 648. **Page 28, Table 1 (all figures in rows named “Consumer Spend (\$)).** This portion  
 22 of the table reveals the total consumer spend represented by the top 100 paid apps experiencing a  
 23 service fee reduction after July 1, 2021 for the given time period, based on both list price and net price.  
 24 This reflects and is calculated from Google’s internal, non-public transactional data. If publicly  
 25 disclosed, it would reveal information about the degree of concentration of consumer spend on Google  
 26 Play, which could be used by Google Play’s app store competitors to inform commercial strategy and  
 27 competition decision-making in an effort to attract developers away from Google.



649. **Page 29, Figure 1 (between “Fee Rate of” and end of sentence; between “product\_id =” and end of sentence).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google's transactional data. The developer identified in this Figure has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google’s relationship with this developer (and potentially others), jeopardizing Google’s future business opportunities with them.

650. **Page 29, Paragraph 39, Note 16 (between “account for” and “of the total”).** This text reveals the portion of total consumer spend represented by the top 100 paid apps experiencing a service fee reduction of at least 10% after July 1, 2021 for the given time period. It reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

651. **Page 30, Paragraph 39 (between “in this group” and “shows a price”).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google's transactional data. The developer identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google’s relationship with this developer (and potentially others), jeopardizing Google’s future business opportunities with them.

652. **Page 30, Table 2 (all figures in rows named “Consumer Spend (\$)).** This portion of the table reveals the total consumer spend represented by the top 100 paid apps experiencing a service fee reduction of at least 10 percentage points after July 1, 2021 for the given time period, based on both list price and net price. This reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to

1 inform commercial strategy and competition decision-making in an effort to attract developers away  
2 from Google.

3 653. Page 31, Figure 2 (between “Fee Rate of” and end of sentence; between  
4 “product\_id =” and end of sentence). This text reflects non-public and confidential information  
5 regarding the identity of a specific non-party developer and developer-specific information derived  
6 from Google's transactional data. The developer identified in this Figure has a reasonable expectation  
7 that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that  
8 data would harm Google’s relationship with this developer (and potentially others), jeopardizing  
9 Google’s future business opportunities with them.

10 654. Page 31, Paragraph 40 (between “30% to” and end of sentence). This text reveals  
11 the effect of Google Play’s July 1, 2021 service fee reduction on the average service fee paid by the  
12 app developers sampled in the expert’s analysis, and is calculated from Google’s internal, non-public  
13 transactional data. If publicly revealed, this information could influence the competitive decision  
14 making and business strategies employed by Google's app store competitors, for example by  
15 influencing how those app stores market themselves to app developers and/or make competitive  
16 decisions around pricing or monetization strategies.

17 655. Page 31, Paragraph 40, Note 19 (between “account for” and “of the total”;  
18 between “apps are games” and “out of 100”; between “such as” and end of sentence). This text  
19 reveals the portion of total consumer spend represented by the top 100 paid apps experiencing a flat  
20 15% service fee reduction or service fee reduction of at least 10% after July 1, 2021 for the given time  
21 period. It reflects and is calculated from Google’s internal, non-public transactional data. If publicly  
22 disclosed, it would reveal information about the degree of concentration of consumer spend on Google  
23 Play, which could be used by Google Play’s app store competitors to inform commercial strategy and  
24 competition decision-making in an effort to attract developers away from Google. This text also  
25 reflects non-public and confidential information regarding the identities of specific non-party  
26 developers and developer-specific information derived from Google's transactional data. The  
27 developers identified in this Paragraph have a reasonable expectation that Google will maintain the  
28

1 confidentiality of data relating to their apps on Google Play. Revealing that data would harm Google's  
 2 relationship with these developers (and potentially others), jeopardizing Google's future business  
 3 opportunities with them.

4 656. **Page 32, Paragraph 40 (between "paid app," and "which experienced")**. This text  
 5 reflects non-public and confidential information regarding the identity of a specific non-party  
 6 developer and developer-specific information derived from Google's transactional data. The developer  
 7 identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality  
 8 of data relating to its app on Google Play. Revealing that data would harm Google's relationship with  
 9 this developer (and potentially others), jeopardizing Google's future business opportunities with them.

10 657. **Page 33, Table 3 (all figures in rows named "Consumer Spend (\$)" and "Average  
 11 Service Fee Rate 2021.07.01 - 2022.05.31")**. This portion of the table in the "Consumer Spend" rows  
 12 reveals the total consumer spend represented by the top 100 paid apps ranked by consumer spend  
 13 among all paid apps for the given time period, based on both list price and net price. This reflects and  
 14 is calculated from Google's internal, non-public transactional data. If publicly disclosed, it would  
 15 reveal information about the degree of concentration of consumer spend on Google Play, which could  
 16 be used by Google Play's app store competitors to inform commercial strategy and competition  
 17 decision-making in an effort to attract developers away from Google. The portion of the table in the  
 18 "Average Service Fee Rate 2021.07.01 - 2022.05.31" row reveals the effect of Google Play's July 1,  
 19 2021 service fee reduction on the average service fee paid by the app developers of the top 100 paid  
 20 apps, and is calculated from Google's internal, non-public transactional data. If publicly revealed, this  
 21 information could influence the competitive decision making and business strategies employed by  
 22 Google's app store competitors, for example by influencing how those app stores market themselves to  
 23 app developers and/or make competitive decisions around pricing or monetization strategies.

24 658. **Page 34, Figure 3 (between "Fee Rate of" and end of sentence; between  
 25 "product\_id =" and end of sentence)**. This text reflects non-public and confidential information  
 26 regarding the identity of a specific non-party developer and developer-specific information derived  
 27 from Google's transactional data. The developer identified in this Figure has a reasonable expectation  
 28

that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google’s relationship with this developer (and potentially others), jeopardizing Google’s future business opportunities with them.

659. **Page 34-35, Paragraph 41 (between “IAP SKU” and “of the app”; between “of the app” and “the top one”).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google’s transactional data. The developer identified in this Figure has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google’s relationship with this developer (and potentially others), jeopardizing Google’s future business opportunities with them.

660. **Page 34-35, Paragraph 41, Note 23 (between “account for” and “of the total consumer”).** This text reveals the portion of total consumer spend represented by the top 100 in-app purchases ranked by consumer spend for the given time period. This reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

661. **Page 36, Table 4 (all figures in rows named “Consumer Spend (\$)).** This portion of the table reveals the total consumer spend represented by the top 100 in-app purchases with a flat service fee reduction of 15% after July 1, 2021 for the given time period, based on both list price and net price. This reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

662. **Page 37, Figure 4 (between “IAP SKU” and “of the App”; between “of the App” and end of sentence; between “product\_id =” and end of sentence).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-

specific information derived from Google's transactional data. The developer identified in this Figure has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's relationship with this developer (and potentially others), jeopardizing Google's future business opportunities with them.

663. **Page 37-38, Paragraph 42 (between "with the app" and "remains the same").** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google's transactional data. The developer identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's relationship with this developer (and potentially others), jeopardizing Google's future business opportunities with them.

664. **Page 37, Paragraph 42, Note 25 (between "account for" and "of the total").** This text reveals the portion of total consumer spend represented by the top 100 in-app purchases with a service fee reduction of at least 10% after July 1, 2021 for the given time period. This reflects and is calculated from Google's internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play's app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

665. **Page 38, Table 5 (all figures in row named "Consumer Spend (\$)").** The portion of the table in the "Consumer Spend" rows reveals the total consumer spend represented by the top 100 in-app purchases with at least a 10% service fee reduction for the given time period, based on both list price and net price. This reflects and is calculated from Google's internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play's app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

666. **Page 39, Figure 5 (between "IAP SKU" and "of the App"; between "of the App" and end of sentence; between "product\_id =" and end of sentence).** This text reflects non-public

1 and confidential information regarding the identity of a specific non-party developer and developer-  
 2 specific information derived from Google's transactional data. The developer identified in this Figure  
 3 has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on  
 4 Google Play. Revealing that data would harm Google's relationship with this developer (and  
 5 potentially others), jeopardizing Google's future business opportunities with them.

6 667. **Page 40, Paragraph 43 (between "top IAP," and "associated with the"; between**  
 7 **"game app" and "had no change").** This text reflects non-public and confidential information  
 8 regarding the identity of a specific non-party developer and developer-specific information derived  
 9 from Google's transactional data. The developer identified in this Paragraph has a reasonable  
 10 expectation that Google will maintain the confidentiality of data relating to its app on Google Play.  
 11 Revealing that data would harm Google's relationship with this developer (and potentially others),  
 12 jeopardizing Google's future business opportunities with them.

13 668. **Page 39, Paragraph 43, Note 28 (between "account for" and "of the total**  
 14 **consumer"; between "apps such as" and "and"; between "and" and end of sentence).** This text  
 15 reveals the portion of total consumer spend represented by the top 100 in-app purchases ranked by  
 16 consumer spend between July 2020 and May 2022. This reflects and is calculated from Google's  
 17 internal, non-public transactional data. If publicly disclosed, it would reveal information about the  
 18 degree of concentration of consumer spend on Google Play, which could be used by Google Play's app  
 19 store competitors to inform commercial strategy and competition decision-making in an effort to  
 20 attract developers away from Google.

21 669. **Page 40, Table 6 (all figures in rows named "Consumer Spend (\$)).** This text  
 22 reveals the total consumer spend represented by the top 100 in-app purchases ranked by consumer  
 23 spend between July 2020 and May 2022. This reflects and is calculated from Google's internal, non-  
 24 public transactional data. If publicly disclosed, it would reveal information about the degree of  
 25 concentration of consumer spend on Google Play, which could be used by Google Play's app store  
 26 competitors to inform commercial strategy and competition decision-making in an effort to attract  
 27 developers away from Google.

670. **Page 41, Figure 6 (between “IAP SKU” and “of the App”; between “of the App” and end of sentence; between “product\_id =” and end of sentence).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google's transactional data. The developer identified in this Figure has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's relationship with this developer (and potentially others), jeopardizing Google's future business opportunities with them.

671. **Page 42, Paragraph 45 (between “account for only” and “of the total consumer”).** This text reveals the portion of total consumer spend represented by the subscription SKUs of a specific Google Play developer that experienced a price drop after Google Play's January 2022 service fee reduction. Although this app belongs to the dating app portfolio of a party to this matter, this percentage reflects and is calculated from Google's internal, non-public transactional data. If publicly disclosed, it would reveal information about the contribution of consumer spend by this customer on Google Play, which could be used by Google Play's app store competitors to inform commercial strategy and competition decision-making in an effort to attract this or other developers away from Google.

672. **Page 42, Paragraph 45, Note 36 (between “May 2022 is” and “close to that”; between “subscription SKUs” and “as shown in”).** This text reveals the total consumer spend represented by the 577 SKUs with non-zero sales of Tinder between August 2016 and May 2022, and the subset of Tinder's subscription SKUs with non-zero sales from July 2020 to May 2022. Although this app belongs to the dating app portfolio of a party to this matter, this figure reflects and is calculated from Google's internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play's app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

673. **Page 43, Table 7 (all figures in rows named “Consumer Spend (\$)” and “Consumer Spend (%)).** This text reveals the consumer spend represented by the subscription



1 SKUs of a specific Google Play developer over two time periods before and after a Google Play  
2 service fee reduction, as well as the portion of consumer spend represented by each subset of SKUs  
3 that either experienced a price reduction, price increase, or no change. Although these SKUs belong to  
4 the dating app portfolio of a party to this matter, these figures reflect and are calculated from Google's  
5 internal, non-public transactional data. If publicly disclosed, it would reveal information about the  
6 contribution of consumer spend by this customer on Google Play, which could be used by Google  
7 Play's app store competitors to inform commercial strategy and competition decision-making in an  
8 effort to attract developers away from Google.

9       **674. Page 44, Paragraph 46, Note 37 (between "was only" and "per SKU"; between**  
10 **"compared to" and "for the existing").** This text reveals the consumer spend represented by new  
11 subscription SKUs of a specific Google Play developer in a given month. Although these SKUs  
12 belong to the dating app portfolio of a party to this matter, these figures reflect and are calculated from  
13 Google's internal, non-public transactional data. If publicly disclosed, it would reveal information  
14 about the contribution of consumer spend by this customer on Google Play, and their relative success  
15 on Google Play, which could be used by Google Play's app store competitors to inform commercial  
16 strategy and competition decision-making in an effort to attract developers away from Google.

17       **675. Page 46, Table 8 ((all figures in rows named "Pass-Through Rate" and "Pass-**  
18 **Through Rate (Upper Bound)" and "Total Consumer Spend (8/16/16-5/31/22").** This text reveals  
19 the total consumer spend on Google Play between August 16, 2016, and May 31, 2022, and the rate at  
20 which developers of apps on Google Play passed through cost savings from lowered service fees onto  
21 consumers in the form of lower prices, as broken down by paid apps, in-app purchases, and  
22 subscriptions. This text reflects Google's non-public, competitively sensitive, and current internal  
23 information concerning consumer spending volume and confidential Google financial information. If  
24 publicly revealed, this information could cause Google competitive harm by giving competitors insight  
25 into consumer spending patterns and Google monetization strategies.

26       **676. Page 56, Paragraph 66 (between "paid app" and "offers two apps").** This text  
27 reflects non-public and confidential information regarding the identity of a specific non-party  
28

1 developer and developer-specific information derived from Google's transactional data. The developer  
2 identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality  
3 of data relating to its app on Google Play. Revealing that data would harm Google's relationship with  
4 this developer (and potentially others), jeopardizing Google's future business opportunities with them.

5 **677. Page 57, Paragraph 66, Note 68 (between "The app" and "also offers IAPs";**  
6 **between "another paid app" and "in the music").** This text reflects non-public and confidential  
7 information regarding the identity of a specific non-party developer and developer-specific information  
8 derived from Google's transactional data. The developer identified in this Paragraph has a reasonable  
9 expectation that Google will maintain the confidentiality of data relating to its app on Google Play.  
10 Revealing that data would harm Google's relationship with this developer (and potentially others),  
11 jeopardizing Google's future business opportunities with them.

12 **678. Page 73, Paragraph 90 (between "decrease from" and "in 2017"; between "2017**  
13 **to" and "in 2021").** This text describes non-public financial figures from 2017 to 2021 relating to  
14 Google Play Billing's revenue-based share in Dr. Rysman's "IAP billing services market", which is  
15 based on non-public competitively sensitive financial data. If publicly revealed, this information could  
16 affect Google's negotiating position with future partners, or lead to conjecture about Google's  
17 financials based on Dr. Rysman's estimates of market share.

18 **679. Page 73, Paragraph 90, Note 106 (between "accounted for" and "of all putative";**  
19 **between "accounted for" and "of consumer spend").** This text reveals the portion of total consumer  
20 spend represented by the top 10 and top 30 putative developer class parents. This reflects and is  
21 calculated from Google's internal, non-public transactional data. If publicly disclosed, it would reveal  
22 information about the degree of concentration of consumer spend on Google Play, which could be used  
23 by Google Play's app store competitors to inform commercial strategy and competition decision-  
24 making in an effort to attract developers away from Google.

25 **680. Page 77, Paragraph 95 (between "it was below" and "during the period").** The  
26 disclosure of this non-party app store's highly confidential information would significantly harm the  
27 app store's business. For example, app store competitors could leverage this information to reap an  
28

1 unearned competitive advantage. They could exploit this information—that they otherwise would not  
2 have access to—to inform their own business strategies. To prevent these competitive harms from  
3 coming to fruition, this app store proactively maintains the confidentiality of its strategic information,  
4 only disclosing it to a select group of individuals on an as-needed basis.

5 **681. Page 79, Paragraph 96, Note 119 (between “Singer argues that” and “Singer**  
6 **Report”).** This text contains confidential, non-public information regarding commercial negotiations  
7 with a non-party partner, and implicates the non-party’s confidentiality interests by purporting to  
8 reveal offers made to that non-party during negotiations. Further, disclosure of this non-public  
9 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
10 which, for example, could give a competitor or potential business partner unfair leverage in competing  
11 against or negotiating with Google.

12 **682. Page 87, Paragraph 105 (between “as zero to” and “assuming a pass-through”).**  
13 This text reflects and is calculated from internal, non-public Google financial data. Were this  
14 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
15 insight into confidential Google financial information.

16 **683. Page 88, Figure 13 (entire chart).** This Figure reflects Google Play’s market shares in  
17 a but-for world according to Plaintiffs’ expert, which are derived from Google’s highly confidential  
18 transactional data. If disclosed, these data points could be used by potential counterparties negotiating  
19 with Google as a benchmark, weakening Google’s competitive position.

20 **684. Page 90-91, Paragraph 110 (between “devices to be” and “and then assumed”;**  
21 **between “the amount of” and “of consumer spend”; “difference between” and “and the actual”;**  
22 **between “subsidy of” and “applied to Google”; between “estimate is” and “larger than”).** The  
23 disclosure of this non-party app store’s highly confidential information would significantly harm the  
24 app store’s business. For example, app store competitors could leverage this information to reap an  
25 unearned competitive advantage. They could exploit this information—that they otherwise would not  
26 have access to—to inform their own business strategies. To prevent these competitive harms from  
27

1 coming to fruition, this app store proactively maintains the confidentiality of its strategic information,  
2 only disclosing it to a select group of individuals on an as-needed basis.

3       685.    **Page 93, Paragraph 112 (between “documents show” and “Further, Dr. Singer”;**  
4 **between “much smaller (” and “of the market”).** The disclosure of this non-party app store’s highly  
5 confidential information would significantly harm the app store’s business. For example, app store  
6 competitors could leverage this information to reap an unearned competitive advantage. They could  
7 exploit this information—that they otherwise would not have access to—to inform their own business  
8 strategies. To prevent these competitive harms from coming to fruition, this app store proactively  
9 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
10 individuals on an as-needed basis.

11       686.    **Page 93, Paragraph 112, Note 153 (between “Amazon documents.” and end of**  
12 **parenthetical).** The disclosure of this non-party app store’s highly confidential information would  
13 significantly harm the app store’s business. For example, app store competitors could leverage this  
14 information to reap an unearned competitive advantage. They could exploit this information—that they  
15 otherwise would not have access to—to inform their own business strategies. To prevent these  
16 competitive harms from coming to fruition, this app store proactively maintains the confidentiality of  
17 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

18       687.    **Page 94, Paragraph 114 (between “calculates the” and “as percentage”; between**  
19 **“devices are about” and “between 2018”; between “total sales above” and “between 2018”;**  
20 **between “devices -” and “for FireTVs”; between “FireTVs and” and “for tablets”).** The  
21 disclosure of this non-party app store’s highly confidential information would significantly harm the  
22 app store’s business. For example, app store competitors could leverage this information to reap an  
23 unearned competitive advantage. They could exploit this information—that they otherwise would not  
24 have access to—to inform their own business strategies. To prevent these competitive harms from  
25 coming to fruition, this app store proactively maintains the confidentiality of its strategic information,  
26 only disclosing it to a select group of individuals on an as-needed basis.

1           688.   **Page 100, Paragraph 128 (between “for about” and “of total revenues”; between**  
2 **“app revenue” and “Therefore,”; between “PSB’s” and “Even if one take’s”; between “marginal**  
3 **costs, the” and “percent figure”).** The disclosure of this non-party developer’s highly confidential  
4 information would significantly harm the developer’s business. For example, app competitors could  
5 leverage this information to reap an unearned competitive advantage. They could exploit this  
6 information—that they otherwise would not have access to—to inform their own business strategies.  
7 To prevent these competitive harms from coming to fruition, this developer proactively maintains the  
8 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
9 needed basis.

10           689.   **Page 103, Paragraph 132 (between “LittleHoots” and end of the sentence).** The  
11 disclosure of this non-party developer’s highly confidential information would significantly harm the  
12 developer’s business. For example, app competitors could leverage this information to reap an  
13 unearned competitive advantage. They could exploit this information—that they otherwise would not  
14 have access to—to inform their own business strategies. To prevent these competitive harms from  
15 coming to fruition, this developer proactively maintains the confidentiality of its strategic information,  
16 only disclosing it to a select group of individuals on an as-needed basis.

17           690.   **Page 107, Figure 14 (entire chart).** This Figure contains the distribution of list prices  
18 of paid downloads of games transacted in May 2022 on Google Play, which is derived from internal,  
19 non-public Google financial data. If disclosed, this data could inform Google's app store competitors  
20 about developers’ monetization strategies and enable them to better compete against Google Play, for  
21 example, by influencing what product investments to make or how to target developers.

22           691.   **Page 107, Figure 15 (entire chart).** This Figure contains the distribution of list prices  
23 of paid downloads of non-game apps transacted in May 2022 on Google Play, which is derived from  
24 internal, non-public Google financial data. If disclosed, this data could inform Google's app store  
25 competitors about developers’ monetization strategies and enable them to better compete against  
26 Google Play, for example, by influencing what product investments to make or how to target  
27 developers.

692. **Page 108, Figure 16 (entire chart).** This Figure contains the distribution of list prices of in-app purchases and subscriptions of games transacted in May 2022 on Google Play, which is derived from internal, non-public Google financial data. If disclosed, this data could inform Google's app store competitors about developers monetization strategies and enable them to better compete against Google Play, for example, by influencing what product investments to make or how to target developers.

693. **Page 108, Figure 17 (entire chart).** This Figure contains the distribution of list prices of in-app purchases and subscriptions of non-games transacted in May 2022 on Google Play, which is derived from internal, non-public Google financial data. If disclosed, this data could inform Google's app store competitors about developers' monetization strategies and enable them to better compete against Google Play, for example, by influencing what product investments to make or how to target developers.

694. **Page 109, Paragraph 143 (between “the game app” and “priced at \$1.99”; between “the game app” and “priced at \$5.99”; between “the game app” and “priced at \$7.49”).** This text reflects non-public and confidential information regarding the identity of a specific non-party developer and developer-specific information derived from Google's transactional data. The developer identified in this Paragraph has a reasonable expectation that Google will maintain the confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's relationship with this developer (and potentially others), jeopardizing Google's future business opportunities with them.

695. **Page 110, Figure 19 (entire chart).** This Figure contains the distribution of quantity of paid app sales in the Games category transacted in May 2022 on Google Play, which is derived from internal, non-public Google financial data. If disclosed, this data could inform Google's app store competitors about the nature of consumer demand for apps and enable them to better compete against Google Play, for example, by influencing what product investments to make or how to target developers.

696. **Page 111, Figure 20 (entire chart).** This Figure contains the distribution of quantity of paid non-game app sales transacted in May 2022 on Google Play, which is derived from internal, non-

1 public Google financial data. If disclosed, this data could inform Google's app store competitors about  
2 the nature of consumer demand for apps and enable them to better compete against Google Play, for  
3 example, by influencing what product investments to make or how to target developers.

4       **697. Page 111, Paragraph 144 (between “total time spent on” and “in September”;**  
5 **between “exceed” and “hours, while”; between “on the app” and “(a game app for kids”).** The  
6 disclosure of this non-party developer’s highly confidential information would significantly harm the  
7 developer’s business. For example, app competitors could leverage this information to reap an  
8 unearned competitive advantage. They could exploit this information—that they otherwise would not  
9 have access to—to inform their own business strategies. To prevent these competitive harms from  
10 coming to fruition, this developer proactively maintains the confidentiality of its strategic information,  
11 only disclosing it to a select group of individuals on an as-needed basis.

12       **698. Page 112, Figure 21 (entire figure).** The disclosure of this non-party developers’  
13 highly confidential information would significantly harm the developer’s business. For example, app  
14 competitors could leverage this information to reap an unearned competitive advantage. They could  
15 exploit this information—that they otherwise would not have access to—to inform their own business  
16 strategies. To prevent these competitive harms from coming to fruition, these developers proactively  
17 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
18 individuals on an as-needed basis.

19       **699. Page 112, Figure 22 (entire figure).** The disclosure of this non-party developers’  
20 highly confidential information would significantly harm the developer’s business. For example, app  
21 competitors could leverage this information to reap an unearned competitive advantage. They could  
22 exploit this information—that they otherwise would not have access to—to inform their own business  
23 strategies. To prevent these competitive harms from coming to fruition, these developers proactively  
24 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
25 individuals on an as-needed basis.

26       **700. Page 123, Paragraph 155 (between “leads to about” and “for consumers”).** This  
27 text reflects and is calculated from internal, non-public Google financial data. Were this information to  
28



1 be publicly revealed, it could cause Google competitive harm by giving competitors insight into  
2 confidential Google financial information, including the magnitude of consumer spend on Google  
3 Play.

4       **701. Page 124, Figure 23 (entire chart).** This chart reveals the monthly total number of  
5 apps on Google Play with non-zero sales, which is calculated from internal, non-public Google  
6 financial data. If publicly disclosed, it could cause Google competitive harm by giving app store  
7 competitors insight into the relative portion of revenue-generating apps on Google Play, which could  
8 serve as a metric to benchmark their own performance against and drive competition decision-making  
9 to Google's detriment.

10       **702. Page 132, Paragraph 164, Note 224 (between "Dr. Rysman" and "See Google,";**  
11 **between "at 558.R" and "Google, "Exploring"; between "529.R-530.R." and end of sentence).**  
12 This text contains non-public and competitively sensitive information that would reveal Google's  
13 strategic thinking related to its business model and potential alternative business models. This  
14 information is non-public. If publicly revealed, this specific information could influence the  
15 competitive decision-making and business strategies employed by Google's app store competitors, or  
16 undermine Google's position in future business dealings by publicizing insight into Google's strictly  
17 confidential strategic thinking. For example, knowledge of Google's inner workings and strategic  
18 considerations could influence competitor app stores' decisions related to how they market, monetize  
19 or structure their business models, or affect Google customer perception regarding perceived value, or  
20 lead to conjecture about Google's future pricing models.

21       **703. Page 141, Paragraph 178 (between "structure, i.e." and "on average based").** This  
22 text reveals the average service fee rate paid by developers on Google Play from January 2022 to May  
23 2022, after various service fee reductions went into effect. This information is non-public and derived  
24 from Google's confidential, internal financial data. If publicly disclosed, it could competitively  
25 disadvantage Google by giving app store competitors insight into Google's non-public average service  
26 fee rate, which could inform those competitors' own fee-setting strategies. This information could also  
27 be used by developer counter-parties in negotiations as a data point seeking similar or better rates.

1           704.   **Page 144, Paragraph 185 (between “damages would be” and “if Google’s current”;**  
 2 **between “which amount to” and end of sentence).** This text reflects and is calculated from internal,  
 3 non-public Google financial data. Were this information to be publicly revealed, it could cause Google  
 4 competitive harm by giving competitors insight into confidential Google financial information,  
 5 including the magnitude of consumer spend on Google Play.

6           705.   **Page 145, Table 11 (all figures in row named “Consumer Damages from**  
 7 **Overcharge”).** This text reflects and is calculated from internal, non-public Google financial data.  
 8 Were this information to be publicly revealed, it could cause Google competitive harm by giving  
 9 competitors insight into confidential Google financial information, including the magnitude of  
 10 consumer spend on Google Play.

11           706.   **Page 146, Paragraph 187 (between “accounts for” and “of total consumer”).** This  
 12 text reveals the value of Play Points subsidies offered by Google to consumers as a percentage of total  
 13 consumer spend. The disclosure of this information would cause serious harm to Google's competitive  
 14 position. For example, if disclosed, it would inform app store competitors of the value of Google Play's  
 15 rewards program in relation to overall consumer spend on Google Play. If revealed publicly, an app  
 16 store competitor could make decisions about its own reward programs and the value of subsidies to  
 17 offer consumers in order to better compete against Google Play and target those same consumers.

18           707.   **Page 147, Paragraph 188 (between “accounts for” and “of total consumer”;**  
 19 **between “consumers account for” and “of total consumer”).** This text reveals the value of non-Play  
 20 Points subsidies offered by both developers and Google to consumers as a percentage of total  
 21 consumer spend. The disclosure of this information would cause serious harm to Google's competitive  
 22 position. For example, if disclosed, it would inform app store competitors of the value of discounts  
 23 offered on Google Play in relation to overall consumer spend on Google Play. If revealed publicly, an  
 24 app store competitor could make decisions about its own promotions or discounts to offer consumers  
 25 in order to better compete against Google Play and target those same consumers.

26           708.   **Page 147, Paragraph 189 (between “the U.S., i.e.,” and “on average based”).** As  
 27 above in Paragraph 187, this text reveals the value of Play Points subsidies offered by Google to  
 28

consumers as a percentage of total consumer spend. The disclosure of this information would cause serious harm to Google's competitive position. For example, if disclosed, it would inform app store competitors of the value of Google Play's rewards program in relation to overall consumer spend on Google Play. If revealed publicly, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers.

709. **Page 147, Paragraph 190 (between “2021, approximately” and “have been”; between “and approximately” and “of points issued”; between “damages downward by” and “Even after this”; between “implying that the” and “is a lower”).** This text contains non-public and confidential statistics relating to Google Play Points, the redemption rate of Google Play Points by consumers, and the portion of Play Points that have expired after 12 months. If publicly disclosed, this could cause serious competitive harm to Google. For example, app store competitors could make decisions about how to structure their own rewards programs and the value of subsidies to offer consumers in order to better compete against Google Play.

710. **Page 148, Paragraph 191 (between “amounts to be” and “on average”).** This text reveals the value of non-Play Points subsidies offered by both developers and Google to consumers as a percentage of total consumer spend. The disclosure of this information would cause serious harm to Google's competitive position. For example, if disclosed, it would inform app store competitors of the value of discounts offered on Google Play in relation to overall consumer spend on Google Play. If revealed publicly, an app store competitor could make decisions about its own promotions or discounts to offer consumers in order to better compete against Google Play and target those same consumers.

711. **Page 148, Table 12 (all figures in rows named “Consumer Damages from Play Points” and “Consumer Damages from Non-Points Google Discounts” and “Combined”).** This text reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information, including the purported value of subsidy from Google Play Points and other non-Play Points discounts offered to consumers.

712. **Page 148, Paragraph 192, Note 270 (between “only up to” and “of U.S. consumers”).** This text contains non-public and confidential statistics relating to the participation in and redemption rate of Google Play Points by consumers. If publicly disclosed, this could cause serious competitive harm to Google. For example, app store competitors could make decisions about how to structure their own rewards programs and the value of subsidies to offer consumers in order to better compete against Google Play.

713. **Page 150, Table 13 (only figures in columns named “Profits-Based Restitution” and “Revenue-Based Restitution” and between rows named “Actual Play Points %” and “But-for Google Discount %”; between “Apps & Games Revenue” and end).** The text in this Table reflects and is calculated from internal, non-public Google financial data, including the purported value of Google Play Points subsidies, the purported value of non-Play Points discounts offered on Google Play, and the but-for revenues, costs, and incremental profits calculated by Plaintiffs’ expert and as modified by Dr. Leonard. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information, including the purported value of subsidy from Google Play Points and other non-Play Points discounts offered to consumers, as well as insights on Google Play’s costs and margins.

714. **Page 151, Table 14 (only figures in columns named “Profits-Based Restitution” and “Revenue-Based Restitution” and between rows named “Actual Play Points %” and end).** The text in this Table reflects and is calculated from internal, non-public Google financial data, including the purported value of Google Play Points subsidies, the purported value of non-Play Points discounts offered on Google Play, and the but-for revenues, costs, and incremental profits calculated by Plaintiffs’ expert and as modified by Dr. Leonard. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information, including the purported value of subsidy from Google Play Points and other non-Play Points discounts offered to consumers, as well as insights on Google Play’s costs and margins.

715. **Page 154, Table 15 (all figures in columns named “Calculation 1 (ONE Store-Based But-for Market Share)” and “Calculation 2 (But-for Market Share Same as Actual)”).** The

text in this Table reflects and is calculated from internal, non-public Google financial data, including the purported value of Google Play Points subsidies, the purported value of non-Play Points discounts offered on Google Play, and the but-for revenues, costs, and incremental profits calculated by Plaintiffs' expert and as modified by Dr. Leonard. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information, including the purported value of subsidy from Google Play Points and other non-Play Points discounts offered to consumers, as well as insights on Google Play's costs and margins.

716. **Page 155, Paragraph 198 (between "rate to be" and "and the but"; between "rate to be" and end of sentence).** This text reveals the value of Play and non-Play Points subsidies offered by both developers and Google to consumers as a percentage of total consumer spend. The disclosure of this information would cause serious harm to Google's competitive position. For example, if disclosed, it would inform app store competitors of the value of discounts and purported Play Points subsidies offered on Google Play in relation to overall consumer spend on Google Play. If revealed publicly, an app store competitor could make decisions about its own rewards programs, promotions, or discounts to offer consumers in order to better compete against Google Play and target those same consumers.

717. **Page 156, Table 16 (only figures in columns named "Calculation 1 (ONE Store-Based But-for Market Share)" and "Calculation 2 (But-for Market Share Same as Actual)" and rows named "Actual Play Points %" and "But-for Play Points %" and "Actual Google Discount %" and "But-for Google Discount %" and "Consumer Spend" and "Reduction in App & Games Revenue" and between "Actual Google Play Apps & Game Reven" and end).** This text reveals the value of Play and non-Play Points subsidies offered by both developers and Google to consumers as a percentage of total consumer spend. The disclosure of this information would cause serious harm to Google's competitive position. For example, if disclosed, it would inform app store competitors of the value of discounts and purported Play Points subsidies offered on Google Play in relation to overall consumer spend on Google Play. If revealed publicly, an app store competitor could

1 make decisions about its own rewards programs, promotions, or discounts to offer consumers in order  
2 to better compete against Google Play and target those same consumers.

3 718. Page 158, Paragraph 202 (between “OkCupid’s damages of” and “and”; between  
4 “and” and “respectively, for total”; between “damages of” and “Using an”; between “OkCupid’s  
5 damages of” and “and”; between “and” and “respectively, for”; between “total damages of” and  
6 “Under Dr. Schwartz’s”). This text reflects and is calculated from internal, non-public Google  
7 financial data, including analysis based on Google’s internal data relating to the purported value of  
8 Google Play. If publicly revealed, this information could influence the competitive decision-making  
9 and business strategies employed by Google’s app store competitors, or be used as data points by  
10 counterparties in negotiations with Google. For example, knowledge of Google’s internal valuation of  
11 its app store services could influence how competitor app stores structure their own business models,  
12 or affect Google customer perception regarding perceived value, or lead to conjecture about Google’s  
13 future pricing models.

14 719. Page 159, Paragraph 202 (between “damages of” and “and”; between “and” and  
15 “respectively, for total”; between “total damages of” and “Using the alternative”; between  
16 “OkCupid’s damages of” and “and”; between “and” and “respectively, for total”; between “total  
17 damages of” and “I note that”; between “damages amount to” and “for Dr. Schwartz’s Base”;  
18 between “Base Case and” and “for Dr. Schwartz’s alternative”). This text reflects and is  
19 calculated from internal, non-public Google financial data, including analysis based on Google’s  
20 internal data relating to the purported value of Google Play. If publicly revealed, this information  
21 could influence the competitive decision-making and business strategies employed by Google’s app  
22 store competitors, or be used as data points by counterparties in negotiations with Google. For  
23 example, knowledge of Google’s internal valuation of its app store services could influence how  
24 competitor app stores structure their own business models, or affect Google customer perception  
25 regarding perceived value, or lead to conjecture about Google’s future pricing models.

26 720. Page 160, Paragraph 205 (between “and Operations,” and “that Dr. Schwarz”;  
27 between “states that” and “and that it”; between “that it is” and “Thus, even if”; between “and  
28

1 **not just” and “Dr. Schwartz ignores”).** This text contains non-public and confidential information  
 2 relating to Google Play's specific internal business strategies and business model considerations,  
 3 including analysis based on Google's internal data and information. If publicly revealed, this specific  
 4 information could influence the competitive decision-making and business strategies employed by  
 5 Google’s app store competitors, or undermine Google's position in future business dealings by  
 6 publicizing insight into Google's strictly confidential strategic thinking. For example, knowledge of  
 7 Google's inner workings and strategic considerations could influence competitor app stores' decisions  
 8 related to how they market, monetize or structure their business models, or affect Google customer  
 9 perception regarding perceived value, or lead to conjecture about Google's future pricing models.

10 **721. Page 161, Paragraph 206 (between “+ Insights,” and “In Google’s August”;**  
 11 **between “damages calculation,” and “Furthermore, although”).** This text contains non-public and  
 12 confidential information relating to Google Play's specific internal business strategies and business  
 13 model considerations, including analysis based on Google's internal data and information. If publicly  
 14 revealed, this specific information could influence the competitive decision-making and business  
 15 strategies employed by Google’s app store competitors, or undermine Google's position in future  
 16 business dealings by publicizing insight into Google's strictly confidential strategic thinking. For  
 17 example, knowledge of Google's inner workings and strategic considerations could influence  
 18 competitor app stores' decisions related to how they market, monetize or structure their business  
 19 models, or affect Google customer perception regarding perceived value, or lead to conjecture about  
 20 Google's future pricing models. This text also reflects non-public and confidential information  
 21 regarding the identity of specific non-party developers and developer-specific information derived  
 22 from Google's transactional data. The developers identified in this Paragraph have a reasonable  
 23 expectation that Google will maintain the confidentiality of data relating to its app on Google Play.  
 24 Revealing that data would harm Google’s relationship with these developers (and potentially others),  
 25 jeopardizing Google’s future business opportunities with them.

26 **722. Page 166, Paragraph 213 (between “the project was” and “Furthermore, the**  
 27 **results”; between “Model were used for” and “Based on a”; between “initial purpose was” and**  
 28



1 **“Over time there”; between “of the model” and “Google has also”**). This text contains non-public  
2 information regarding Google’s confidential non-public internal strategic considerations related to  
3 creating value for and attracting developers to the Google Play Store. This information has never been  
4 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
5 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
6 to attract developers away from Google. If publicly revealed, this specific information could influence  
7 the competitive decision-making and business strategies employed by Google’s app store competitors,  
8 or undermine Google's position in future business dealings by publicizing insight into Google's strictly  
9 confidential strategic thinking. For example, knowledge of Google's inner workings and strategic  
10 considerations could influence competitor app stores' decisions related to how they market, monetize  
11 or structure their business models, or affect Google customer perception regarding perceived value, or  
12 lead to conjecture about Google's future pricing models.

13 723. **Page 167, Paragraph 214 (between “to be used” and “Additionally, what I”;**  
14 **between “presentation titled” and “also addresses”; between “Play Value Model” and end of**  
15 **sentence)**. This text contains non-public and confidential information relating to Google Play's  
16 specific internal business strategies and business model considerations, including analysis based on  
17 Google's internal data and information. If publicly revealed, this specific information could influence  
18 the competitive decision-making and business strategies employed by Google’s app store competitors,  
19 or undermine Google's position in future business dealings by publicizing insight into Google's strictly  
20 confidential strategic thinking. For example, knowledge of Google's inner workings and strategic  
21 considerations could influence competitor app stores' decisions related to how they market, monetize  
22 or structure their business models, or affect Google customer perception regarding perceived value, or  
23 lead to conjecture about Google's future pricing models.

24 724. **Page 167, Paragraph 215 (between “Estimate of” and “that was specifically”)**. This  
25 text contains non-public and confidential information relating to Google Play's specific internal  
26 business strategies and business model considerations, including analysis based on Google's internal  
27 data and information pertaining to a specific developer. If publicly revealed, this specific information  
28

1 could influence the competitive decision-making and business strategies employed by Google's app  
2 store competitors, or undermine Google's position in future business dealings by publicizing insight  
3 into Google's strictly confidential strategic thinking. For example, knowledge of Google's inner  
4 workings and strategic considerations, particularly with respect to a given developer, could influence  
5 competitor app stores' decisions related to how they market, monetize or structure their business  
6 models, including to specific developers.

7       **725. Page 168, Paragraph 215 (between “Estimate of” and “for the Q1”; between**  
8 **“Estimates of” and “and”; between “and” and “Furthermore, Sarah”; between “Google was”**  
9 **and “Additionally”; between “Additionally” and end of sentence).** This text contains non-public  
10 and confidential information relating to Google Play's specific internal business strategies and business  
11 model considerations, including analysis based on Google's internal data and information. If publicly  
12 revealed, this specific information could influence the competitive decision-making and business  
13 strategies employed by Google's app store competitors, or undermine Google's position in future  
14 business dealings by publicizing insight into Google's strictly confidential strategic thinking. For  
15 example, knowledge of Google's inner workings and strategic considerations could influence  
16 competitor app stores' decisions related to how they market, monetize or structure their business  
17 models, or affect Google customer perception regarding perceived value, or lead to conjecture about  
18 Google's future pricing models.

19       **726. Page 169, Paragraph 218 (between “Play Value Estimate” and “that we do”;**  
20 **between “and care about” and end of paragraph).** This text contains non-public and confidential  
21 information regarding Google Play's internal assessment of its business model. This information  
22 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
23 publicly revealed, could be referenced by potential counterparties in negotiations with Google to gain  
24 an unfair advantage against Google.

25       **727. Page 170, Paragraph 218 (between “the slide titled” and “The notes**  
26 **corresponding”, and between “indicate” and end of sentence).** This text contains non-public and  
27 confidential information regarding Google Play's internal assessment of its business model. This  
28

information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if publicly revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

728. **Page 170, Paragraph 219 (between "provided to developers" and end of sentence).**

This text contains non-public and confidential information regarding Google Play's internal assessment of its business model, including references to analysis based on Google's internal data and information. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if publicly revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

729. **Page 170-171, Paragraph 220 (between "2021 addresses" and "According to Google" and between "According to Google" and end of sentence).** This text contains non-public and confidential information regarding Google Play's internal assessment of its business model, including references to analysis based on Google's internal data and information and potential future changes to Google's internal assessments. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if publicly revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

730. **Page 171, Paragraph 220, Note 325 (between "caveat that state" and "GOOG-PLAY-011023692").** This text contains non-public and confidential information regarding Google Play's internal assessment of its business model, including references to internal, confidential strategy documents and related limitations. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if publicly revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

731. **Page 172-173, Paragraph 222 (in the first sub-bullet, between "relies on the" and "in this model"; between "Play Value of" and "of"; between "of" and "Alternative CPI"; between "provides an" and "that generates"; between "generates a" and end of sentence; between "Alternative CPI Valuation #2:" and end of sentence; between "Alternative LTV Valuation #1:" and end of sentence).** This text contains non-public and confidential information

1 relating to Google Play's specific internal business strategies and business model considerations,  
2 including analysis based on Google's internal data and information pertaining to a specific developer.  
3 If publicly revealed, this specific information could influence the competitive decision-making and  
4 business strategies employed by Google's app store competitors, or undermine Google's position in  
5 future business dealings by publicizing insight into Google's strictly confidential strategic thinking. For  
6 example, knowledge of Google's inner workings and strategic considerations, particularly with respect  
7 to a given developer, could influence competitor app stores' decisions related to how they market,  
8 monetize or structure their business models, including to specific developers.

9       **732. Page 172, Paragraph 222, Note 331 (between “also generates a” and “GOOG-**  
10 **PLAY-011274244”).** This text contains non-public and confidential information relating to Google  
11 Play's specific internal business strategies and business model considerations, including analysis based  
12 on Google's internal data and information pertaining to a specific developer. If publicly revealed, this  
13 specific information could influence the competitive decision-making and business strategies  
14 employed by Google's app store competitors, or undermine Google's position in future business  
15 dealings by publicizing insight into Google's strictly confidential strategic thinking. For example,  
16 knowledge of Google's inner workings and strategic considerations, particularly with respect to a given  
17 developer, could influence competitor app stores' decisions related to how they market, monetize or  
18 structure their business models, including to specific developers.

19       **733. Page 173, Paragraph 223 (between “uses the initial” and “in the Tinder”; between**  
20 **“adjusts the” and “I understand that”; between “I understand that” and “Furthermore,**  
21 **according”; between “to Google” and “In contrast”; between “the initial” and “in the Tinder”;**  
22 **between “identified as a” and end of sentence).** This text contains non-public and confidential  
23 information relating to Google Play's specific internal business strategies and business model  
24 considerations, including analysis based on Google's internal data and information pertaining to a  
25 specific developer. If publicly revealed, this specific information could influence the competitive  
26 decision-making and business strategies employed by Google's app store competitors, or undermine  
27  
28

Google's position in future business dealings by publicizing insight into Google's strictly confidential strategic thinking.

734. **Page 173, Paragraph 223, note 335 (between “¶ 459” and “GOOG-PLAY-004625919”).** This text contains non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If publicly revealed, this specific information could influence the competitive decision-making and business strategies employed by Google's app store competitors, or undermine Google's position in future business dealings by publicizing insight into Google's strictly confidential strategic thinking.

735. **Page 173, Paragraph 224 (between “model from” and “and to ignore”; between “ignore other” and “versions of Tinder”; between “calculation of” and “and, ultimately, damages”).** This text contains non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If publicly revealed, this specific information could influence the competitive decision-making and business strategies employed by Google's app store competitors, or undermine Google's position in future business dealings by publicizing insight into Google's strictly confidential strategic thinking.

736. **Page 175, Paragraph 225 (between “account for” and “in revenue”; between “revenue and” and “transactions in”).** This text contains non-public and confidential information relating to Google Play's confidential financial information, including analysis based on Google's internal data and the impact of certain errors made in adjustments to that data performed by Plaintiff's expert. If publicly revealed, this specific information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information.

737. **Page 175-176, Paragraph 226 (between “Schwartz's” and “Adjustment”; between “begins with the” and “presented in”; between “based on the” and “Specifically, he”; between “adjustment to the” and “Then he subtracts”; between “figure the” and “This figure is”; between “with the Tinder” and “and then performs”).** This information reflects and is calculated

1 from internal, non-public Google financial data. Google spends significant resources compiling and  
2 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
3 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
4 competitors insight into confidential Google financial information. Further, this information reflects  
5 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
6 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
7 against Google.

8       **738. Page 176, Paragraph 227 (between “corresponding to the” and “and”; between**  
9 **“and” and “presented in the”; between “his 55.1%” and “adjustment”; between “the 55.1%”**  
10 **and “adjustment based”; between “more accurate” and “adjustment at the”).** This information  
11 reflects and is calculated from internal, non-public Google financial data. It also reflects non-public  
12 and confidential information relating to Google Play's specific internal business strategies and business  
13 model considerations, including analysis based on Google's internal data and detailed adjustments to  
14 that data performed by Plaintiff's expert. If revealed to competitors and potential business  
15 counterparties, this information could be used to disadvantage and cause Google competitive harm by  
16 giving competitors insight into confidential Google financial information and internal strategic  
17 thinking.

18       **739. Page 177, Paragraph 228 (between “more accurate” and “adjustment as follows”;**  
19 **between “adjustment as follows:” and “Applying the more”; between “more accurate” and**  
20 **“adjustment of”; between “to the” and “from the Tinder”; between “an estimated” and**  
21 **“versus”; between “versus” and “based on”; between “Dividing” and “by”; between “by” and**  
22 **“Google Play”; between “results in” and “versus”; between “versus” and “based on”).** This  
23 information reflects and is calculated from internal, non-public Google financial data. It also reflects  
24 non-public and confidential information relating to Google Play's specific internal business strategies  
25 and business model considerations, including analysis based on Google's internal data and detailed  
26 adjustments to that data performed by Plaintiff's expert which pertain to a specific developer. If  
27  
28

publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

740. **Page 177, Paragraph 229 (between "Baseline Tinder" and "with the"; between "with the" and "calculated above").** This text contains non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and information pertaining to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

741. **Page 178, Table 17 (between "Dr. Schwartz's" and "Adjustment"; all figures in rows named "Tinder" and "OkCupid" and "Total Damages").** This Table reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If revealed to competitors and potential business counterparties, this information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

742. **Page 177, Paragraph 230 (between "Dr. Schwartz's" and "As discussed above"; between "view the" and "Play Value Model"; between "Schwartz adjusting the" and "in the Tinder"; between "Estimate to an" and end of sentence).** This text contains non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and information pertaining to a specific developer. If publicly revealed, this specific information could influence the competitive decision-making and business strategies employed by Google's app store competitors, or undermine Google's position in future business dealings by publicizing insight into Google's strictly confidential strategic thinking.

743. **Page 178, Paragraph 231 (between "Dr. Schwartz's" and "and, alternatively"; between "the Tinder" and "of"; between "of" and "presented in the"; between "Schwartz's**



adjusted” and “figure”; between “Dividing” and “by”; between “by” and “Google Play”; between “results in a” and “versus”; between “versus” and “based on Dr.”). This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If revealed to competitors and potential business counterparties, this information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

744. Page 179, Paragraph 232 (between “Dr. Schwartz's” and “with the”; between “with the” and “calculated above”; between “Baseline OkCupid” and “which he calculates”; between “Baseline Tinder” and “with a more”; between “I use the” and “presented in the”; between “this figure by” and “during the”; between “calculate a” and “versus”; between “versus” and “based on”). This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If revealed to competitors and potential business counterparties, this information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

745. Page 179, Table 18 (between “Schwartz's” and “Adjustment”; all figures in rows named “OkCupid” and “Tinder” and “Total Damages”). This text reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

746. **Page 179, Paragraph 233 (between “Ignores Other” and “Play Value Models”; between “there is an” and “Play Value Model”; between “a Tinder” and “of”; between “of” and “and an estimated”; between “OkCupid” and “of”; between “of” and “I refer to”; between “the Alternative” and “Valuation”).** This text reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

747. **Page 180, Paragraph 234 (between “more accurate” and “adjustment of”; between “the Tinder” and “of”; between “of” and “million generates”; between “estimated Tinder” and “of”; between “of” and “versus”; between “versus” and “based on”; between “Dividing” and “by”; between “by” and “Google Play Tinder”; between “results in a” and “of”; between “of” and “versus”; between “versus” and “based on Dr. Schwartz's”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business model considerations, including analysis based on Google's internal data pertaining to a specific developer and detailed adjustments to that data performed by Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

748. **Page 180, Paragraph 235 (between “replacing Dr. Schwartz's” and “with the”; between “with the” and “calculated above”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff's expert. If revealed to competitors and potential business counterparties, this information

could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

749. **Page 181, Table 19 (between “Damages Alternative” and “Valuation”; between “Dr. Schwartz’s” and “Adjustment”; all figures in rows named “Tinder” and “OkCupid” and “Total Damages”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff’s expert. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

750. **Page 181, Paragraph 236 (between “the Tinder” and “of”; between “of” and “and OkCupid”; between “and OkCupid” and “of”; between “of” and “but do not”; between “Dr. Schwartz’s” and “adjustment.”; between “Dividing” and “by”; between “by” and “Google Play Tinder”; between “results in a” and “versus”; between “versus” and “based on”; between “Dividing” and “by 4.4 million”; between “results in a” and “versus”; between “versus” and “based on”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific business model considerations, including valuation analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff’s expert. If revealed to competitors and potential business counterparties, this information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

751. **Page 181, Paragraph 237 (between “Dr. Schwartz’s” and “with the”; between “with the” and “calculated above”; between “replacing Dr. Schwartz’s” and “with the”; between “with the” and “calculated above”).** This text reflects non-public and confidential information relating to Google Play's specific internal business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by Plaintiff’s expert. If revealed

1 to competitors and potential business counterparties, this information could be used to disadvantage  
 2 and cause Google competitive harm by giving competitors insight into confidential Google financial  
 3 information and internal strategic thinking.

4       **752. Page 182, Table 20 (between “Alternative” and “Valuation #1”; between**  
 5 **“Schwartz’s” and “Adjustment”; all figures in rows named “OkCupid” and “Tinder” and**  
 6 **“Total Damages”).** This information reflects and is calculated from internal, non-public Google  
 7 financial data. It also reflects non-public and confidential information relating to Google Play's specific  
 8 internal business model considerations, including analysis based on Google's internal data pertaining to  
 9 a specific developer and detailed adjustments to that data performed by Plaintiff’s expert. If publicly  
 10 disclosed, it could provide app store competitors or competitors to that developer insight into Google’s  
 11 thinking about its value proposition to this developer.

12       **753. Page 182, Paragraph 238 (between “to perform his” and “there is”; between**  
 13 **“there is an” and “Play Value”; between “the model, the” and “Play Value”; between “Model**  
 14 **provides” and “I refer to”; between “valuation as the” and “Valuation #2”; between “that**  
 15 **provide the” and “components of”; between “rely on this” and “version of the”).** This text  
 16 describes analyses performed by Plaintiff’s expert that is based on Google's internal, confidential  
 17 financial data. It also reflects Google Play's specific internal business model considerations and  
 18 strategic thinking. If revealed to competitors and potential business counterparties, this information  
 19 could be used to disadvantage and cause Google competitive harm by giving competitors insight into  
 20 confidential Google financial information and internal strategic thinking.

21       **754. Page 182, Paragraph 238, Note 350 (between “corresponding OkCupid” and**  
 22 **“provided in this”).** This text describes an internal Google document related to Google’s internal,  
 23 strategic thinking about a particular developer and how Google assesses its business model in relation  
 24 to that developer. If publicly disclosed, it could provide app store competitors or competitors to that  
 25 developer insight into Google’s thinking about its value proposition to this developer.

26       **755. Page 182, Paragraph 239 (between “the Tinder” and “of”; between “of” and “and**  
 27 **do not”; between “Dr. Schwartz’s” and “Dividing”; between “Dividing” and “by”; between “by”**  
 28

1 and “Google Play Tinder”; between “results in a” and “of”; between “of” and “versus”; between  
 2 “Value in the” and “Valuation #2”; between “Valuation #2 is” and “which is”; between “Model  
 3 of” and “Therefore, in”; between “calculation of the” and “by dividing”; between “by dividing”  
 4 and “by”; between “by” and “Google Play Tinder”; between “pre-install figure of” and  
 5 “versus”; between “versus” and “based on Dr.”). This text describes analyses performed by both  
 6 Google’s expert and Plaintiff’s expert that is based on Google’s internal, confidential financial data and  
 7 relates to a specific developer. It also reflects Google Play’s specific internal business model  
 8 considerations and strategic thinking. If revealed to competitors and potential business counterparties,  
 9 this information could be used to disadvantage and cause Google competitive harm by giving  
 10 competitors insight into confidential Google financial information and internal strategic thinking.

11 756. Page 183, Paragraph 240 (between “replacing Dr. Schwartz’s” and “with the”;  
 12 between “with the” and “calculated above”; between “Dr. Schwartz’s” and “with the”; between  
 13 “with the” and “calculated above”). This text describes analyses performed by both Google’s expert  
 14 and Plaintiff’s expert that is based on Google’s internal, confidential financial data and relates to a  
 15 specific developer. It also reflects Google Play’s specific internal business model considerations and  
 16 strategic thinking. If revealed to competitors and potential business counterparties, this information  
 17 could be used to disadvantage and cause Google competitive harm by giving competitors insight into  
 18 confidential Google financial information and internal strategic thinking.

19 757. Page 184, Table 21 (between “Alternative” and “Valuation #2”; between  
 20 “Schwartz’s” and “Adjustment”; all figures in rows named “OkCupid” and “Tinder” and  
 21 “Total Damages”). This Table reflects and is calculated from Google’s internal, confidential financial  
 22 data and relates to a specific developer. It also reflects Google Play’s specific internal business model  
 23 considerations and strategic thinking. If revealed to competitors and potential business counterparties,  
 24 this information could be used to disadvantage and cause Google competitive harm by giving  
 25 competitors insight into confidential Google financial information and internal strategic thinking.

26 758. Page 184, Paragraph 241 (between “perform his” and “adjustment there”;  
 27 between “also an” and “Play Value Model”; between “the model, the” and “Play Value”;  
 28

1 between “provides a Tinder” and “of”; between “of” and “I refer to”; between “valuation as  
 2 the” and “Valuation #1”; between “provide the” and “components of the”; between “rely on  
 3 this” and “version of the model”). This text describes analyses performed by Plaintiffs’ expert that  
 4 reflect and are calculated from Google’s internal, confidential financial data. These analyses also  
 5 reflect strategic thinking about a particular developer and how Google assesses its business model in  
 6 relation to that developer. If publicly disclosed, it could provide app store competitors or competitors  
 7 to that developer insight into Google’s thinking about its value proposition to this developer.

8 759. Page 184-185, Paragraph 242 (between “use the Tinder” and “Value of”; between  
 9 “Value of” and “and given”; between “begins with an” and “Value there is”; between “apply  
 10 any” and “adjustment. Dividing”; between “Dividing” and “by”; between “by” and “Google  
 11 Play Tinder”; between “results in a” and “versus”; between “versus” and “based on Dr.”;  
 12 between “Value in the” and “Valuation #1”; between “#1 is” and “which is different”; between  
 13 “Damages Model of” and “Therefore, in”; between “Install by dividing” and “by”; between “by”  
 14 and “Google Play Tinder”; between “figure of” and “versus”; between “versus” and “based on  
 15 Dr.”). This text describes an analysis performed by Google’s expert that is based on Google’s internal,  
 16 confidential financial data and that relates to a specific developer. It also reflects Google Play’s specific  
 17 internal business model considerations and strategic thinking. If revealed to competitors and potential  
 18 business counterparties, this information could be used to disadvantage and cause Google competitive  
 19 harm by giving competitors insight into confidential Google financial information and internal  
 20 strategic thinking.

21 760. Page 185, Paragraph 243 (between “replacing Dr. Schwartz’s” and “with the”;  
 22 between “with the” and “calculated above”; between “Dr. Schwartz’s” and “with the”; between  
 23 “with the” and “calculated above”). This text describes an analysis performed by Google’s expert  
 24 that is based on Google’s internal, confidential financial data and that relates to a specific developer. It  
 25 also reflects Google Play’s specific internal business model considerations and strategic thinking. If  
 26 revealed to competitors and potential business counterparties, this information could be used to

disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and internal strategic thinking.

761. **Page 185, Table 22 (between “Alternative” and “Valuation #1”; between “Schwartz’s” and “Adjustment”; all figures in rows named “OkCupid” and “Tinder” and “Total Damages”).** The figures in this Table reflect an analysis performed by Google’s expert that is based on Google’s internal, confidential financial data and that relates to a specific developer. It also reflects Google Play’s specific internal business model considerations and strategic thinking. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

762. **Page 188, Table 23 (entire chart).** The figures in this Table reflect an analysis performed by Google’s expert that is based on Google’s internal, confidential financial data and that relates to a specific developer. If revealed to competitors and potential business counterparties, this information could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and the magnitude of Google Play sales of this developer, which could be used by Google’s competitors to target and attract that developer.

763. **Page 188-189, Paragraph 247 (between “states that a” and “But Dr. Schwartz”; between “that acknowledges” and “Therefore, Dr. Schwartz’s”; between “value and the” and end of sentence).** This text describes an internal Google document related to Google’s internal, strategic thinking about its business model and the types of value Google Play delivers to its partners. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to developers. For example, knowledge of Google’s internal valuation of its app store services could influence how competitor app stores structure their own business models, or affect Google customer perception regarding perceived value, or lead to conjecture about Google’s future pricing models.

764. **Page 189, Paragraph 248 (between “the slide is” and “This reflects the”; between “states the following” and end of sentence).** This text describes an internal Google document



related to Google’s internal, strategic thinking about its business model. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to developers. For example, knowledge of Google’s internal valuation of its app store services could influence how competitor app stores structure their own business models, or affect Google customer perception regarding perceived value, or lead to conjecture about Google’s future pricing models.

765. **Page 190, Paragraph 249 (between “employee that indicates” and “Dr. Schwartz”; between “statement that follows” and end of sentence).** This text describes an internal Google email related to Google’s internal, strategic thinking about its business model as related to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this specific developer or app developers like it. For example, knowledge of Google’s internal valuation of its app store services could influence how competitor app stores structure their own business models, or affect Google customer perception regarding perceived value.

766. **Page 190-91, Paragraph 250 (between “from GPS is” and “However, as discussed”; between “Model quantifies” and end of sentence; between “Marchak states that” and “and that it is”; between “and that it is” and end of sentence).** This text describes Google’s internal, strategic thinking about its business model and the value proposition it provides to a particular developer. It also reflects and describes internal Google analysis based on confidential financial data. Disclosure of this information would cause Google competitive harm by enabling Google’s competitors to tailor their business and competitive-decision making in a way that disadvantages Google.

767. **Page 191-192, Paragraph 251 (between “relating to the” and “among other types”; between “As noted above” and “By ignoring evidence”; between “Play Store, implying” and end of sentence).** This text contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would

adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

768. **Page 194-95, Paragraph 256 (between "be up to" and end of sentence; between "be up to" and "related to"; between "and up to" and "based on other").** This information reflects and is calculated from internal, non-public Google financial data, including related to Google's Play Points program. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information and the purported value of subsidies provided by Google Play's rewards program, which could be used by Google's competitors to tailor their own marketing, monetization, or other competitive strategies.

769. **Page 195, Paragraph 258 (between "have paid" and "more in service"; between "12/31/2021 and" and "for the period").** This information reflects and is calculated from internal, non-public Google financial data for a specific developer. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information, and could be used by Google's competitors to target this developer or developers like it.

770. **Page 218-219, Appendix C, Paragraph 5 (between "July 1, 2021" and "of the month"; between "IAPs and" and "of the month").** This text contains the portion of transactions subject to a 30% service fee and a 15% service fee from March 2009 to July 2021, and from July 2021 to May 2022. It reflects and is calculated from internal, non-public Google financial data. Public disclosure of this information could cause Google serious competitive harm by revealing to app store competitors sensitive financial information relating to Google Play's transactions and service fee, which could allow those competitors to tailor their own monetization and price-setting strategies to developers.

771. **Page 220, Appendix C, Paragraph 8, Table C.1 (all figures in rows named “Pass-Through Rate” and “Pass-Through Rate (Upper Bound)” and “Total Consumer Spend (8/16/16-5/31/22)”)**. This text reveals the total consumer spend on Google Play between August 16, 2016, and May 31, 2022, and the rate at which developers of apps on Google Play passed through cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by paid apps, in-app purchases, and subscriptions. This text reflects Google’s non-public, competitively sensitive, and current internal information concerning consumer spending volume and confidential Google financial information. If publicly revealed, this information could cause Google competitive harm by giving competitors insight into consumer spending patterns and Google monetization strategies.

772. **Page 220, Appendix C, Paragraph 9 (between “bounds are” and “for IAPs,”; between “for IAPs,” and “for paid downloads”; between “downloads, and” and “for subscriptions”)**. This text reflects an analysis of the rate at which developers of apps on Google Play passed through cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by paid apps, in-app purchases, and subscriptions. Although these figures are provided in the form of confidence intervals, they reveal the upper bound of pass-through rates, which imply information about the actual analyzed pass-through rates. This text reflects Google’s non-public, competitively sensitive, and current internal information concerning developer pricing information and confidential Google financial information. If publicly revealed, this information could cause Google competitive harm by giving competitors insight into developer pricing strategies and consumer spending behavior.

773. **Page 221, Appendix C, Table C.2 (all figures in row named “Pass-Through Rate”)**. This text reflects an analysis of the rate at which developers of apps on Google Play passed through cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by paid apps, in-app purchases, and subscriptions. Although these figures are provided in the form of confidence intervals, they reveal the upper bound of pass-through rates, which imply information about the actual analyzed pass-through rates. This text reflects Google’s non-public, competitively sensitive, and current internal information concerning developer pricing information and confidential Google

1 financial information. If publicly revealed, this information could cause Google competitive harm by  
2 giving competitors insight into developer pricing strategies and consumer spending behavior.

3 **774. Page 222, Appendix C, Table C.3 (all figures in row named “Pass-Through Rate”).**

4 This text reflects an analysis of the rate at which developers of apps on Google Play passed through  
5 cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by  
6 paid apps, in-app purchases, and subscriptions. Although these figures are provided in the form of  
7 confidence intervals, they reveal the upper bound of pass-through rates, which imply information about  
8 the actual analyzed pass-through rates. This text reflects Google’s non-public, competitively sensitive,  
9 and current internal information concerning developer pricing information and confidential Google  
10 financial information. If publicly revealed, this information could cause Google competitive harm by  
11 giving competitors insight into developer pricing strategies and consumer spending behavior.

12 **775. Page 222, Appendix C, Table C.4 (all figures in row named “Pass-Through Rate”).**

13 This text reflects an analysis of the rate at which developers of apps on Google Play passed through  
14 cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by  
15 paid apps, in-app purchases, and subscriptions. Although these figures are provided in the form of  
16 confidence intervals, they reveal the upper bound of pass-through rates, which imply information about  
17 the actual analyzed pass-through rates. This text reflects Google’s non-public, competitively sensitive,  
18 and current internal information concerning developer pricing information and confidential Google  
19 financial information. If publicly revealed, this information could cause Google competitive harm by  
20 giving competitors insight into developer pricing strategies and consumer spending behavior.

21 **776. Page 223, Appendix C, Table C.5 (all figures in row named “Pass-Through Rate”).**

22 This text reflects an analysis of the rate at which developers of apps on Google Play passed through  
23 cost savings from lowered service fees onto consumers in the form of lower prices, as broken down by  
24 paid apps, in-app purchases, and subscriptions. Although these figures are provided in the form of  
25 confidence intervals, they reveal the upper bound of pass-through rates, which imply information about  
26 the actual analyzed pass-through rates. This text reflects Google’s non-public, competitively sensitive,  
27 and current internal information concerning developer pricing information and confidential Google  
28

1 financial information. If publicly revealed, this information could cause Google competitive harm by  
2 giving competitors insight into developer pricing strategies and consumer spending behavior.

3 777. **Page 229, Appendix E, Paragraph 4 (between “7.3%, or” and “lower, than”).** The  
4 text contains the results of an expert analysis relating to consumer damages as calculated by Google’s  
5 damages expert. It reflects and is calculated from confidential, internal Google financial information.  
6 This data is non-public or otherwise publicly reported by the company and their disclosure is likely to  
7 cause Google competitive harm and give its competitors an unfair advantage. Google's competitors  
8 could improperly utilize this internal, non-public data to modify or augment their business operations  
9 in an effort to compete unfairly against Google.

10 778. **Page 247, Exhibit 1a (all figures in rows named “Consumer Spend (\$)).** This  
11 exhibit corresponds to Table 1 of this document, which Google also moves to seal. As previously  
12 stated, this portion of the table reveals the total consumer spend represented by the top 100 paid apps  
13 experiencing a service fee reduction after July 1, 2021 for the given time period, based on both list  
14 price and net price. This reflects and is calculated from Google’s internal, non-public transactional  
15 data. If publicly disclosed, it would reveal information about the degree of concentration of consumer  
16 spend on Google Play, which could be used by Google Play’s app store competitors to inform  
17 commercial strategy and competition decision-making in an effort to attract developers away from  
18 Google.

19 779. **Page 248, Exhibit 1b (all figures in rows named “Consumer Spend (\$)).** This  
20 exhibit corresponds to Table 2 of this document, which Google also moves to seal. This portion of the  
21 table reveals the total consumer spend represented by the top 100 paid apps experiencing a service fee  
22 reduction of at least 10 percentage points after July 1, 2021 for the given time period, based on both  
23 list price and net price. This reflects and is calculated from Google’s internal, non-public transactional  
24 data. If publicly disclosed, it would reveal information about the degree of concentration of consumer  
25 spend on Google Play, which could be used by Google Play’s app store competitors to inform  
26 commercial strategy and competition decision-making in an effort to attract developers away from  
27 Google.

780. **Page 249, Exhibit 1c (all figures in rows named “Consumer Spend (\$)” and “Average Service Fee Rate 2021.07.01 - 2022.05.31” and “Average Net Price 2021.07.01 - 2022.05.31”).** This exhibit corresponds to Table 3 of this document, which Google also moves to seal. This portion of the table in the “Consumer Spend” rows reveals the total consumer spend represented by the top 100 paid apps ranked by consumer spend among all paid apps for the given time period, based on both list price and net price. This reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google. The portion of the table in the “Average Service Fee Rate 2021.07.01 - 2022.05.31” row reveals the effect of Google Play’s July 1, 2021 service fee reduction on the average service fee paid by the app developers of the top 100 paid apps, and is calculated from Google’s internal, non-public transactional data. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to app developers and/or make competitive decisions around pricing or monetization strategies.

781. **Page 250, Exhibit 2a (all figures in rows named “Consumer Spend (\$)”).** This exhibit corresponds to Table 4 of this document, which Google also moves to seal. This portion of the table reveals the total consumer spend represented by the top 100 in-app purchases with a flat service fee reduction of 15% after July 1, 2021 for the given time period, based on both list price and net price. This reflects and is calculated from Google’s internal, non-public transactional data. If publicly disclosed, it would reveal information about the degree of concentration of consumer spend on Google Play, which could be used by Google Play’s app store competitors to inform commercial strategy and competition decision-making in an effort to attract developers away from Google.

782. **Page 251, Exhibit 2b (all figures in rows named “Consumer Spend (\$)”).** This exhibit corresponds to Table 5 in this document, which Google also moves to seal. The portion of the table in the “Consumer Spend” rows reveals the total consumer spend represented by the top 100 in-

1 app purchases with at least a 10% service fee reduction for the given time period, based on both list  
2 price and net price. This reflects and is calculated from Google's internal, non-public transactional  
3 data. If publicly disclosed, it would reveal information about the degree of concentration of consumer  
4 spend on Google Play, which could be used by Google Play's app store competitors to inform  
5 commercial strategy and competition decision-making in an effort to attract developers away from  
6 Google.

7 783. **Page 252, Exhibit 2c (all figures in rows named "Consumer Spend (\$)").** This  
8 exhibit corresponds to Table 6 in this document, which Google also moves to seal. This text reveals  
9 the total consumer spend represented by the top 100 in-app purchases ranked by consumer spend  
10 between July 2020 and May 2022. This reflects and is calculated from Google's internal, non-public  
11 transactional data. If publicly disclosed, it would reveal information about the degree of concentration  
12 of consumer spend on Google Play, which could be used by Google Play's app store competitors to  
13 inform commercial strategy and competition decision-making in an effort to attract developers away  
14 from Google.

15 784. **Page 253, Exhibit 3a (all figures in column named "App Package Name").** This text  
16 contains confidential, non-public information regarding non-party developers, and implicates the non-  
17 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
18 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
19 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
20 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
21 decision-making, which, for example, could give a competitor or potential business partner unfair  
22 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
23 this non-party information to unfairly target Google's developer partners.

24 785. **Page 254, Exhibit 3b (all figures in column named "App Package Name").** This text  
25 contains confidential, non-public information regarding non-party developers, and implicates the non-  
26 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
27 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
28



1 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
2 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
3 decision-making, which, for example, could give a competitor or potential business partner unfair  
4 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
5 this non-party information to unfairly target Google's developer partners.

6 786. **Page 255, Exhibit 3c (all figures in column named "App Package Name")**. This text  
7 contains confidential, non-public information regarding non-party developers, and implicates the non-  
8 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
9 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
10 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
11 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
12 decision-making, which, for example, could give a competitor or potential business partner unfair  
13 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
14 this non-party information to unfairly target Google's developer partners.

15 787. **Page 256, Exhibit 4a (all figures in rows named "Consumer Spend (\$)")**. This  
16 exhibit corresponds to Table 7 in this document, which Google also moves to seal. This text reveals the  
17 consumer spend represented by the subscription SKUs of a specific Google Play developer over two  
18 time periods before and after a Google Play service fee reduction, as well as the portion of consumer  
19 spend represented by each subset of SKUs that either experienced a price reduction, price increase, or  
20 no change. Although these SKUs belong to the dating app portfolio of a party to this matter, these  
21 figures reflect and are calculated from Google's internal, non-public transactional data. If publicly  
22 disclosed, it would reveal information about the contribution of consumer spend by this customer on  
23 Google Play, which could be used by Google Play's app store competitors to inform commercial  
24 strategy and competition decision-making in an effort to attract developers away from Google.

25 788. **Page 257, Exhibit 4b (all figures in rows named "Consumer Spend (\$)")**. This text  
26 reveals the consumer spend represented by the subscription SKUs of a specific Google Play developer  
27 over two time periods before and after a Google Play service fee reduction, as well as the portion of  
28

1 consumer spend represented by each subset of SKUs that either experienced a price reduction, price  
2 increase, or no change. Although these SKUs belong to the dating app portfolio of a party to this  
3 matter, these figures reflect and are calculated from Google's internal, non-public transactional data. If  
4 publicly disclosed, it would reveal information about the contribution of consumer spend by this  
5 customer on Google Play, which could be used by Google Play's app store competitors to inform  
6 commercial strategy and competition decision-making in an effort to attract developers away from  
7 Google.

8       789.   **Page 258, Exhibit 5 (all figures in row named "Total Consumer Spend (8/16/16-**  
9 **5/31/22")**. This text reflects an analysis of the rate at which developers of apps on Google Play passed  
10 through cost savings from lowered service fees onto consumers in the form of lower prices, as broken  
11 down by paid apps, in-app purchases, and subscriptions, as well as total consumer spend on Google  
12 Play for the period of August 16, 2022 to May 31, 2022. This text reflects Google's non-public,  
13 competitively sensitive, and current internal information concerning developer pricing information and  
14 confidential Google financial information. If publicly revealed, this information could cause Google  
15 competitive harm by giving competitors insight into developer pricing strategies and consumer  
16 spending behavior.

17       790.   **Page 266, Exhibit 7f (entire chart)**. This exhibit corresponds with Figure 13 of this  
18 document, which Google also moves to seal. This exhibit reflects Google Play's market shares in a  
19 but-for world according to Plaintiffs' expert, which are derived from Google's highly confidential  
20 transactional data. If disclosed, this could cause Google competitive harm by giving Google's  
21 competitors insight into Google's confidential financial information.

22       791.   **Page 267, Exhibit 8a (all figures in column named "Consumer Class Damages**  
23 **based on Dr. Singer's Model (\$M)")**. This portion of the exhibit contains expert analysis relating to  
24 purported consumer damages from Dr. Singer's app distribution market model, which reflects and is  
25 calculated from Google's internal, confidential financial data. If disclosed, this could cause Google  
26 competitive harm by giving Google's competitors insight into Google's confidential financial  
27 information.

1           792.   **Page 272, Exhibit 9a (entire chart).** This portion of the exhibit contains expert  
2 analysis relating to purported consumer damages from Dr. Singer's IAP model, which reflects and is  
3 calculated from Google's internal, confidential financial data. If disclosed, this could cause Google  
4 competitive harm by giving Google's competitors insight into Google's confidential financial  
5 information.

6           793.   **Page 273, Exhibit 9b (entire chart).** This portion of the exhibit contains expert  
7 analysis relating to purported consumer damages from Dr. Singer's combined market discount model,  
8 which reflects and is calculated from Google's internal, confidential financial data. If disclosed, this  
9 could cause Google competitive harm by giving Google's competitors insight into Google's  
10 confidential financial information.

11           794.   **Page 274, Exhibit 10a (entire chart).** This portion of the exhibit contains expert  
12 analysis relating to purported consumer damages, which reflects and is calculated from Google's  
13 internal, confidential financial data. If disclosed, this could cause Google competitive harm by giving  
14 Google's competitors insight into Google's confidential financial information.

15           795.   **Page 275, Exhibit 10b (entire chart).** This exhibit corresponds to Figure 17 in the  
16 document, which Google also moves to seal. This exhibit contains the distribution of list prices of in-  
17 app purchases and subscriptions of non-games transacted in May 2022 on Google Play, which is  
18 derived from internal, non-public Google financial data. If disclosed, this data could inform Google's  
19 app store competitors about developers' monetization strategies and enable them to better compete  
20 against Google Play, for example, by influencing what product investments to make or how to target  
21 developers.

22           796.   **Page 276, Exhibit 11a (entire chart).** This exhibit corresponds to Figure 19 in the  
23 document, which Google also moves to seal. This exhibit contains the distribution of quantity of paid  
24 app sales in the Games category transacted in May 2022 on Google Play, which is derived from  
25 internal, non-public Google financial data. If disclosed, this data could inform Google's app store  
26 competitors about the nature of consumer demand for apps and enable them to better compete against  
27

1 Google Play, for example, by influencing what product investments to make or how to target  
2 developers.

3 797. **Page 277, Exhibit 11b (entire chart).** This exhibit corresponds to Figure 20 in the  
4 document, which Google also moves to seal. This exhibit contains the distribution of quantity of paid  
5 non-game app sales transacted in May 2022 on Google Play, which is derived from internal, non-  
6 public Google financial data. If disclosed, this data could inform Google's app store competitors about  
7 the nature of consumer demand for apps and enable them to better compete against Google Play, for  
8 example, by influencing what product investments to make or how to target developers.

9 798. **Page 278, Exhibit 12 (entire charts).** This exhibit reveals the total hours spent on  
10 selected apps monthly, which is derived from non-party highly confidential information and reflects  
11 the confidential data of Google's business partners. Google's business parties, who are not parties to  
12 this litigation, have a reasonable expectation that Google will maintain the confidentiality of  
13 contractual terms.

14 799. **Page 279, Exhibit 13 (entire chart).** This exhibit corresponds to Figure 22 in the  
15 document, which Google also moves to seal. This exhibit reveals the total hours spent on selected apps  
16 in the month September 2021, which is derived from non-party highly confidential information and  
17 reflects the confidential data of Google's business partners. Google's business parties, who are not  
18 parties to this litigation, have a reasonable expectation that Google will maintain the confidentiality of  
19 contractual terms.

20 800. **Page 280, Exhibit 14 (entire chart).** This text contains the share of consumer spend on  
21 the Samsung Galaxy Store as compared to consumer spend on Google Play on Samsung devices in the  
22 United States. It reflects and is calculated, in part, from confidential Google financial data. If  
23 disclosed, it could cause Google serious competitive harm by giving app store competitors insight into  
24 Google's internal confidential financial information and confidential data points on the makeup of the  
25 U.S. market for app store spend, which could be used to inform competitive strategy to disadvantage  
26 Google.

801. **Page 281, Exhibit 15a (entire chart).** This exhibit corresponds to Figure 23 of this document, which Google also moves to seal. This chart reveals the monthly total number of apps on Google Play with non-zero sales, which is calculated from internal, non-public Google financial data. If publicly disclosed, it could cause Google competitive harm by giving app store competitors insight into the relative portion of revenue-generating apps on Google Play, which could serve as a metric to benchmark their own performance against and drive competition decision-making to Google's detriment.

802. **Page 285, Exhibit 18 (all figures in column named "Consumer Damages from Overcharge").** This text reflects and is calculated from confidential Google financial data. If publicly revealed, this information could cause Google competitive harm by giving competitors insight into consumer spending patterns, including over time and by geography, which could be used to disadvantage Google.

803. **Page 287, Exhibit 19 (all figures in columns named "Consumer Damages from Play Points" and "Consumer Damages from Non-Points Google Discounts" and "Consumer Damages (Combined)").** This text reflects and is calculated from confidential Google financial data, including data related to Google's Play Points program. If publicly revealed, this information could cause Google competitive harm by giving competitors insight into consumer spending patterns, as well as the purported value of Play subsidies, which could be used to disadvantage Google.

804. **Page 290, Exhibit 21 (figures in columns named "Profits-Based Restitution" and "Revenue-Based Restitution" in the rows "Actual Google Play Apps & Games Revenue", "Actual Play Points %", "But-for Play Points %", "Actual Google Discount %", "But-for Google Discount %", and all rows from "But-For Google Play App & Game Revenue" through end of chart).** This text reflects and is calculated from confidential Google financial data, including data related to Google's Play Points program and other confidential discount data. It also reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal,

1 non-public data to modify or augment their business operations in an effort to compete unfairly against  
 2 Google. If publicly revealed, this information could cause Google competitive harm by giving  
 3 competitors insight into consumer spending patterns, as well as the purported value of Play subsidies  
 4 and cost structures, which could be used to disadvantage Google.

5 805. **Page 291, Exhibit 22 (all figures in columns named “Profits-Based Restitution”**  
 6 **and “Revenue-Based Restitution” except for the rows “Actual Service Fee Rate” and “But-for**  
 7 **Service Fee Rate”).** This text reflects and is calculated from confidential Google financial data,  
 8 including data related to Google’s Play Points program and other confidential discount data. It also  
 9 reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
 10 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
 11 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
 12 internal, non-public data to modify or augment their business operations in an effort to compete  
 13 unfairly against Google. If publicly revealed, this information could cause Google competitive harm by  
 14 giving competitors insight into consumer spending patterns, as well as the purported value of Play  
 15 subsidies and cost structures, which could be used to disadvantage Google.

16 806. **Page 292, Exhibit 23 (all dollar figures in columns named “Calculation 1 (ONE**  
 17 **Store-Based But-for Market Share)” and “Calculation 2 (But-for-Market Share Same as**  
 18 **Actual)” as well as the rows “Actual Play Points %”, “But-for Play Points %”, “Actual Google**  
 19 **Discount %”, and “But-for Google Discount %”, “Percentage Reduction in Per-Unit Spend”,**  
 20 **and “Actual Google Play Operating Profit”).** This text reflects and is calculated from confidential  
 21 Google financial data, including data related to Google’s Play Points program and other confidential  
 22 discount data. It also reveals Google's internal non-public profit, revenue, and financial calculations.  
 23 These data sets are not otherwise publicly reported by the company and their disclosure is likely to  
 24 cause Google competitive harm and give its competitors an unfair advantage. Google's competitors  
 25 could improperly utilize this internal, non-public data to modify or augment their business operations  
 26 in an effort to compete unfairly against Google. If publicly revealed, this information could cause

Google competitive harm by giving competitors insight into consumer spending patterns, as well as the purported value of Play subsidies and cost structures, which could be used to disadvantage Google.

807. **Page 293, Exhibit 24 (all dollar figures in columns named “Calculation 1 (ONE Store-Based But-for Market Share)” and “Calculation 2 (But-for-Market Share Same as Actual)” as well as the rows “Actual Play Points %”, “But-for Play Points %”, “Actual Google Discount %”, and “But-for Google Discount %”, and “Actual Google Play Operating Profit”).** This text reflects and is calculated from confidential Google financial data, including data related to Google’s Play Points program and other confidential discount data. It also reveals Google’s internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google’s competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. If publicly revealed, this information could cause Google competitive harm by giving competitors insight into consumer spending patterns, as well as the purported value of Play subsidies and cost structures, which could be used to disadvantage Google.

808. **Page 294, Exhibit 25 (all figures in columns named “Main Damages Period” and “Alternative Damages Period” and “1/1/2022-5/20/2022”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play’s specific internal business strategies and business model considerations, including analysis based on Google’s internal data and detailed adjustments to that data performed by both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this developer, which could be used by app store competitors to target that developer.

809. **Page 296, Exhibit 26a (all figures in columns named “Actual Service Fees Incurred from Google Play’s Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”, “Play Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is



1 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
2 information relating to Google Play's specific internal business strategies and business model  
3 considerations, including analysis based on Google's internal data and detailed adjustments to that data  
4 performed by both Google's expert and Plaintiff's expert which pertain to a specific developer. If  
5 publicly disclosed, it could provide app store competitors or competitors to that developer insight into  
6 Google's thinking about its value proposition to this developer, which could be used by app store  
7 competitors to target that developer.

8       **810. Page 297, Exhibit 26b (all figures in columns named "Estimated Service Fees**  
9 **Incurred from Google Play's Billing System", "Play Discovery Value", "But-for Form of**  
10 **Payment Fees", "Play Discovery Value," "Total", and "Total Damages").** This information  
11 reflects and is calculated from internal, non-public Google financial data. It also reflects non-public  
12 and confidential information relating to Google Play's specific internal business strategies and business  
13 model considerations, including analysis based on Google's internal data and detailed adjustments to  
14 that data performed by both Google's expert and Plaintiff's expert which pertain to a specific  
15 developer. If publicly disclosed, it could provide app store competitors or competitors to that developer  
16 insight into Google's thinking about its value proposition to this developer, which could be used by  
17 app store competitors to target that developer.

18       **811. Page 298, Exhibit 26c (entire chart; between beginning of sentence and "[2] The**  
19 **Android Application"; between "downloaded from Play" and "Sources:").** This information  
20 reflects and is calculated from internal, non-public Google financial data. It also reflects non-public  
21 and confidential information relating to Google Play's specific internal business strategies and business  
22 model considerations, including highly sensitive competitive analysis based on Google's internal data  
23 and detailed adjustments to that data performed by both Google's expert Plaintiff's expert which  
24 pertain to a specific developer. If publicly disclosed, it could provide app store competitors or  
25 competitors to that developer insight into Google's thinking about its value proposition to this  
26 developer.

1           812.   **Page 299, Exhibit 26d (entire chart and notes).** This information reflects and is  
2 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
3 information relating to Google Play's specific internal business strategies and business model  
4 considerations, including highly sensitive competitive analysis based on Google's internal data and  
5 detailed adjustments to that data performed by both Google's expert Plaintiff's expert which pertain to  
6 a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that  
7 developer insight into Google's thinking about its value proposition to this developer.

8           813.   **Page 300, Exhibit 27a (all figures in columns named "Actual Service Fees Incurred**  
9 **from Google Play's Billing System", "Play Discovery Value", "But-for Form of Payment Fees",**  
10 **"Play Discovery Value," "Total", and "Total Damages").** This information reflects and is  
11 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
12 information relating to Google Play's specific internal business strategies and business model  
13 considerations, including analysis based on Google's internal data and detailed adjustments to that data  
14 performed by both Google's expert and Plaintiff's expert which pertain to a specific developer. If  
15 publicly disclosed, it could provide app store competitors or competitors to that developer insight into  
16 Google's thinking about its value proposition to this developer, which could be used by app store  
17 competitors to target that developer.

18           814.   **Page 301, Exhibit 27b (between "Dr. Schwartz" and "Adjustment"; all figures in**  
19 **columns named "Estimated Service Fees Incurred from Google Play's Billing System", "Play**  
20 **Discovery Value", "But-for Form of Payment Fees", "Play Discovery Value," "Total", and**  
21 **"Total Damages").** This information reflects and is calculated from internal, non-public Google  
22 financial data. It also reflects non-public and confidential information relating to Google Play's specific  
23 internal business strategies and business model considerations, including analysis based on Google's  
24 internal data and detailed adjustments to that data performed by both Google's expert and Plaintiff's  
25 expert which pertain to a specific developer. If publicly disclosed, it could provide app store  
26 competitors or competitors to that developer insight into Google's thinking about its value proposition  
27 to this developer, which could be used by app store competitors to target that developer.

1           815.   **Page 302, Exhibit 27c (entire chart and notes).** This information reflects and is  
2 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
3 information relating to Google Play's specific internal business strategies and business model  
4 considerations, including highly sensitive competitive analysis based on Google's internal data and  
5 detailed adjustments to that data performed by both Google's expert Plaintiff's expert which pertain to  
6 a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that  
7 developer insight into Google's thinking about its value proposition to this developer.

8           816.   **Page 303, Exhibit 27d (entire chart and notes).** This information reflects and is  
9 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
10 information relating to Google Play's specific internal business strategies and business model  
11 considerations, including highly sensitive competitive analysis based on Google's internal data and  
12 detailed adjustments to that data performed by both Google's expert Plaintiff's expert which pertain to  
13 a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that  
14 developer insight into Google's thinking about its value proposition to this developer.

15           817.   **Page 304, Exhibit 28a (between "Dr. Schwartz" and "Adjustment"; all figures in**  
16 **columns named "Actual Service Fees Incurred from Google Play's Billing System", "Play**  
17 **Discovery Value", "But-for Form of Payment Fees", "Play Discovery Value," "Total", and**  
18 **"Total Damages").** This information reflects and is calculated from internal, non-public Google  
19 financial data. It also reflects non-public and confidential information relating to Google Play's specific  
20 internal business strategies and business model considerations, including analysis based on Google's  
21 internal data and detailed adjustments to that data performed by both Google's expert and Plaintiff's  
22 expert which pertain to a specific developer. If publicly disclosed, it could provide app store  
23 competitors or competitors to that developer insight into Google's thinking about its value proposition  
24 to this developer, which could be used by app store competitors to target that developer.

25           818.   **Page 305, Exhibit 28b (between "Dr. Schwartz" and "Adjustment"; all figures in**  
26 **columns named "Estimated Service Fees Incurred from Google Play's Billing System", "Play**  
27 **Discovery Value", "But-for Form of Payment Fees", "Play Discovery Value," "Total", and**  
28

1 **“Total Damages”**). This information reflects and is calculated from internal, non-public Google  
 2 financial data. It also reflects non-public and confidential information relating to Google Play's specific  
 3 internal business strategies and business model considerations, including analysis based on Google's  
 4 internal data and detailed adjustments to that data performed by both Google's expert and Plaintiff's  
 5 expert which pertain to a specific developer. If publicly disclosed, it could provide app store  
 6 competitors or competitors to that developer insight into Google's thinking about its value proposition  
 7 to this developer, which could be used by app store competitors to target that developer.

8 819. **Page 306, Exhibit 28c (between “Dr. Schwartz's” and “Adjustment”; entire chart;  
 9 and in Note 2, from “calculated by” to end of sentence”**). This information reflects and is calculated  
 10 from internal, non-public Google financial data. It also reflects non-public and confidential information  
 11 relating to Google Play's specific internal business strategies and business model considerations,  
 12 including highly sensitive competitive analysis based on Google's internal data as related to a specific  
 13 developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert.  
 14 If publicly disclosed, it could provide app store competitors or competitors to that developer insight  
 15 into Google's thinking about its value proposition to this developer.

16 820. **Page 307, Exhibit 28d (between “Dr. Schwartz's” and “Adjustment”; between  
 17 “Total In-App Revenue when App was Downloaded from Play” and end of column; all figures in  
 18 columns named “OkCupid” and “Tinder”**). This information reflects and is calculated from  
 19 internal, non-public Google financial data. It also reflects non-public and confidential information  
 20 relating to Google Play's specific internal business strategies and business model considerations,  
 21 including highly sensitive competitive analysis based on Google's internal data as related to a specific  
 22 developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert.  
 23 If publicly disclosed, it could provide app store competitors or competitors to that developer insight  
 24 into Google's thinking about its value proposition to this developer.

25 821. **Page 308, Exhibit 29a (between “Alternative” and “Valuation #1”; between “Dr.  
 26 Schwartz” and “Adjustment”; all figures in columns named “Actual Service Fees Incurred from  
 27 Google Play's Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”, “Play**

**Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this developer, which could be used by app store competitors to target that developer.

822. **Page 309, Exhibit 29b (between “Alternative” and “Valuation #1”; between “Dr. Schwartz” and “Adjustment”; all figures in columns named “Estimated Service Fees Incurred from Google Play’s Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”, “Play Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this developer, which could be used by app store competitors to target that developer.

823. **Page 310, Exhibit 29c (between “Analysis #3:” and “Valuation #1”; between “Schwartz’s” and “Adjustment”; all figures in columns named “Metric” and “OkCupid” and “Tinder”; between “Notes” and “[2] The Android”; between “downloaded from Play” and “Sources:”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including highly sensitive competitive analysis based on Google's internal data as related to a specific developer, and detailed adjustments to that data performed by both Google’s expert Plaintiff’s expert. If publicly disclosed, it could provide

1 app store competitors or competitors to that developer insight into Google's thinking about its value  
2 proposition to this developer.

3 824. Page 311, Exhibit 29d (between "Analysis #3:" and "Valuation #1";  
4 between "Schwartz's" and "Adjustment"; all figures in columns named "Metric" and  
5 "OkCupid" and "Tinder"). This information reflects and is calculated from internal, non-public  
6 Google financial data. It also reflects non-public and confidential information relating to Google Play's  
7 specific internal business strategies and business model considerations, including highly sensitive  
8 competitive analysis based on Google's internal data as related to a specific developer, and detailed  
9 adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it  
10 could provide app store competitors or competitors to that developer insight into Google's thinking  
11 about its value proposition to this developer.

12 825. Page 312, Exhibit 30a (between "Alternative" and "Valuation #1"; between "Dr.  
13 Schwartz" and "Adjustment"; all figures in columns named "Actual Service Fees Incurred from  
14 Google Play's Billing System", "Play Discovery Value", "But-for Form of Payment Fees", "Play  
15 Discovery Value," "Total", and "Total Damages"). This information reflects and is calculated from  
16 internal, non-public Google financial data. It also reflects non-public and confidential information  
17 relating to Google Play's specific internal business strategies and business model considerations,  
18 including analysis based on Google's internal data and detailed adjustments to that data performed by  
19 both Google's expert and Plaintiff's expert which pertain to a specific developer. If publicly disclosed,  
20 it could provide app store competitors or competitors to that developer insight into Google's thinking  
21 about its value proposition to this developer, which could be used by app store competitors to target  
22 that developer.

23 826. Page 313, Exhibit 30b (between "Alternative" and "Valuation #1"; between "Dr.  
24 Schwartz" and "Adjustment"; all figures in columns named "Estimated Service Fees Incurred  
25 from Google Play's Billing System", "Play Discovery Value", "But-for Form of Payment Fees",  
26 "Play Discovery Value," "Total", and "Total Damages"). This information reflects and is  
27 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
28

1 information relating to Google Play's specific internal business strategies and business model  
2 considerations, including analysis based on Google's internal data and detailed adjustments to that data  
3 performed by both Google's expert and Plaintiff's expert which pertain to a specific developer. If  
4 publicly disclosed, it could provide app store competitors or competitors to that developer insight into  
5 Google's thinking about its value proposition to this developer, which could be used by app store  
6 competitors to target that developer.

7       **827. Page 314, Exhibit 30c (between "Alternative" and "Valuation #1"; between**  
8 **"Schwartz's" and end of sentence; between "Metric" and "(2018 Q1 - 2019 Q1)"; all figures in**  
9 **columns named "OkCupid" and "Tinder"; between "was downloaded from Play" and**  
10 **"Sources:").** This information reflects and is calculated from internal, non-public Google financial  
11 data. It also reflects non-public and confidential information relating to Google Play's specific internal  
12 business strategies and business model considerations, including highly sensitive competitive analysis  
13 based on Google's internal data as related to a specific developer, and detailed adjustments to that data  
14 performed by both Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store  
15 competitors or competitors to that developer insight into Google's thinking about its value proposition  
16 to this developer.

17       **828. Page 315, Exhibit 30d (between "Alternative" and "Valuation #1"; between**  
18 **"Schwartz's" and end of sentence; between "Total In-App Revenue when App was Downloaded**  
19 **from Play" and end of column; all figures in columns named "OkCupid" and "Tinder").** This  
20 information reflects and is calculated from internal, non-public Google financial data. It also reflects  
21 non-public and confidential information relating to Google Play's specific internal business strategies  
22 and business model considerations, including highly sensitive competitive analysis based on Google's  
23 internal data as related to a specific developer, and detailed adjustments to that data performed by both  
24 Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or  
25 competitors to that developer insight into Google's thinking about its value proposition to this  
26 developer.



1           **829. Page 316, Exhibit 31a (between “Alternative” and “Valuation #2”; between “Dr.**  
 2 **Schwartz” and “Adjustment”; all figures in columns named “Actual Service Fees Incurred from**  
 3 **Google Play’s Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”, “Play**  
 4 **Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is calculated from  
 5 internal, non-public Google financial data. It also reflects non-public and confidential information  
 6 relating to Google Play's specific internal business strategies and business model considerations,  
 7 including analysis based on Google's internal data and detailed adjustments to that data performed by  
 8 both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If publicly disclosed,  
 9 it could provide app store competitors or competitors to that developer insight into Google’s thinking  
 10 about its value proposition to this developer, which could be used by app store competitors to target  
 11 that developer.

12           **830. Page 317, Exhibit 31b (between “Alternative” and “Valuation #2”; between “Dr.**  
 13 **Schwartz” and “Adjustment”; all figures in columns named “Estimated Service Fees Incurred**  
 14 **from Google Play’s Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”,**  
 15 **“Play Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is  
 16 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
 17 information relating to Google Play's specific internal business strategies and business model  
 18 considerations, including analysis based on Google's internal data and detailed adjustments to that data  
 19 performed by both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If  
 20 publicly disclosed, it could provide app store competitors or competitors to that developer insight into  
 21 Google’s thinking about its value proposition to this developer, which could be used by app store  
 22 competitors to target that developer.

23           **831. Page 318, Exhibit 31c (between “Alternative” and “Valuation #2”; between**  
 24 **“Schwartz’s” and “Adjustment”; between “Metric” and “(2018 Q1 - 2019 Q1)”; all figures in**  
 25 **columns named “OkCupid” and “Tinder”; between “was downloaded from Play” and**  
 26 **“Sources:”).** This information reflects and is calculated from internal, non-public Google financial  
 27 data. It also reflects non-public and confidential information relating to Google Play's specific internal  
 28

1 business strategies and business model considerations, including highly sensitive competitive analysis  
2 based on Google's internal data as related to a specific developer, and detailed adjustments to that data  
3 performed by both Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store  
4 competitors or competitors to that developer insight into Google's thinking about its value proposition  
5 to this developer.

6 832. Page 319, Exhibit 31d (between "Alternative" and "Valuation #2"; between  
7 "Schwartz's" and "Adjustment"; between "Total In-App Revenue when App was Downloaded  
8 from Play" and "Play Delivery Value"; between "Total Play Value" and "as Percent of Total  
9 Revenue"; all figures in columns named "OkCupid" and "Tinder"). This information reflects and  
10 is calculated from internal, non-public Google financial data. It also reflects non-public and  
11 confidential information relating to Google Play's specific internal business strategies and business  
12 model considerations, including highly sensitive competitive analysis based on Google's internal data  
13 as related to a specific developer, and detailed adjustments to that data performed by both Google's  
14 expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to  
15 that developer insight into Google's thinking about its value proposition to this developer.

16 833. Page 320, Exhibit 32a (between "Alternative" and "Valuation #1"; between "Dr.  
17 Schwartz" and "Adjustment"; all figures in columns named "Actual Service Fees Incurred from  
18 Google Play's Billing System", "Play Discovery Value", "But-for Form of Payment Fees", "Play  
19 Discovery Value," "Total", and "Total Damages"). This information reflects and is calculated from  
20 internal, non-public Google financial data. It also reflects non-public and confidential information  
21 relating to Google Play's specific internal business strategies and business model considerations,  
22 including analysis based on Google's internal data and detailed adjustments to that data performed by  
23 both Google's expert and Plaintiff's expert which pertain to a specific developer. If publicly disclosed,  
24 it could provide app store competitors or competitors to that developer insight into Google's thinking  
25 about its value proposition to this developer, which could be used by app store competitors to target  
26 that developer.

834. **Page 321, Exhibit 32b (between “Alternative” and “Valuation #1”; between “Dr. Schwartz” and “Adjustment”; all figures in columns named “Estimated Service Fees Incurred from Google Play’s Billing System”, “Play Discovery Value”, “But-for Form of Payment Fees”, “Play Discovery Value,” “Total”, and “Total Damages”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including analysis based on Google's internal data and detailed adjustments to that data performed by both Google’s expert and Plaintiff’s expert which pertain to a specific developer. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this developer, which could be used by app store competitors to target that developer.

835. **Page 322, Exhibit 32c (between “Alternative” and “Valuation #1”; between “Schwartz’s” and “Adjustment”; between “Metric” and “(2018 Q1 - 2019 Q1)”; all figures in columns named “OkCupid” and “Tinder”; between “was downloaded from Play” and “Sources:”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including highly sensitive competitive analysis based on Google's internal data as related to a specific developer, and detailed adjustments to that data performed by both Google’s expert Plaintiff’s expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google’s thinking about its value proposition to this developer.

836. **Page 323, Exhibit 32d (between “Alternative” and “Valuation #1”; between “Schwartz’s” and “Adjustment”; between “was Downloaded from Play” and “Play Delivery Value”; between “Total Play Value” and “Play Delivery Value as Percent of Total Revenue”; all figures in columns named “OkCupid” and “Tinder”).** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations,

1 including highly sensitive competitive analysis based on Google's internal data as related to a specific  
2 developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert.  
3 If publicly disclosed, it could provide app store competitors or competitors to that developer insight  
4 into Google's thinking about its value proposition to this developer.

5 837. **Page 324, Exhibit 33a (all figures in columns named "Main Damages Period",**  
6 **"Alternative Damages Period" and "1/1/2022-5/20/2022").** This information reflects and is  
7 calculated from internal, non-public Google financial data. It also reflects non-public and confidential  
8 information relating to Google Play's specific internal business strategies and business model  
9 considerations, including highly sensitive competitive analysis based on Google's internal data as  
10 related to a specific developer, and detailed adjustments to that data performed by both Google's  
11 expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to  
12 that developer insight into Google's thinking about its value proposition to this developer.

13 838. **Page 325, Exhibit 33b (all figures in columns named "Subscriptions," "In-App**  
14 **Purchases", and "Total").** This information reflects and is calculated from internal, non-public  
15 Google financial data. It also reflects non-public and confidential information relating to Google Play's  
16 specific internal business strategies and business model considerations, including highly sensitive  
17 competitive analysis based on Google's internal data as related to a specific developer, and detailed  
18 adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it  
19 could provide app store competitors or competitors to that developer insight into Google's thinking  
20 about its value proposition to this developer.

21 839. **Page 326, Exhibit 33c (all figures in columns named "Subscriptions," "In-App**  
22 **Purchases", and "Total").** This information reflects and is calculated from internal, non-public  
23 Google financial data. It also reflects non-public and confidential information relating to Google Play's  
24 specific internal business strategies and business model considerations, including highly sensitive  
25 competitive analysis based on Google's internal data as related to a specific developer, and detailed  
26 adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it  
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28

1 could provide app store competitors or competitors to that developer insight into Google’s thinking  
2 about its value proposition to this developer.

3       840.    **Page 329, Exhibit 34a (all figures in columns named “2017” and “2018” and**  
4 **“2019” and “2020” and “2021” and “Total”).** This information reflects consumer spend and  
5 associated but-for service fees from a specific developer and is calculated from internal, non-public  
6 Google financial data. If publicly disclosed, it could provide app store competitors or competitors to  
7 that developer insight into the volume of consumer spend generated by this developer on Google Play,  
8 which could allow them to unfairly target this developer or tailor their competitive decision-making  
9 toward developers like it.

10       841.    **Page 331, Exhibit 34c (all figures in columns named “Processing Fees” and**  
11 **“Revenue”).** This information reflects consumer spend and associated but-for service fees under  
12 alternative service fee providers for a specific developer and is calculated from internal, non-public  
13 Google financial data. If publicly disclosed, it could provide app store competitors or competitors to  
14 that developer insight into the volume of consumer spend generated by this developer on Google Play,  
15 which could allow them to unfairly target this developer or tailor their competitive decision-making  
16 toward developers like it.

17       842.    **Page 332, Exhibit 34d (all figures in columns named “Android Revenue Processed**  
18 **through Google Play’s Billing System”; “But-For Form of Payment Rate,” and “But-For Form**  
19 **of Payment Fees”).** This information reflects and is calculated from internal, non-public Google  
20 financial data. It also reflects non-public and confidential information relating to Google Play's specific  
21 internal business strategies and business model considerations, including highly sensitive competitive  
22 analysis based on Google's internal data as related to a specific developer, and detailed adjustments to  
23 that data performed by both Google’s expert Plaintiff’s expert. If publicly disclosed, it could provide  
24 app store competitors or competitors to that developer insight into Google’s thinking about its value  
25 proposition to this developer.

26       843.    **Page 335, Exhibit 34g (all figures in columns named “Metric” and “Scenario 1”**  
27 **and “Scenario 2” and notes).** This information reflects and is calculated from internal, non-public

Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including highly sensitive competitive analysis based on Google's internal data as related to a specific developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

844. **Page 336, Exhibit 34h (all figures in columns named "OkCupid" and "Tinder").**

This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including highly sensitive competitive analysis based on Google's internal data as related to a specific developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

845. **Page 337, Exhibit 34i (all figures in columns named "Android Revenue Processed through Google Play's Billing System"; "But-For Form of Payment Rate," and "But-For Form of Payment Fees").** This information reflects and is calculated from internal, non-public Google financial data. It also reflects non-public and confidential information relating to Google Play's specific internal business strategies and business model considerations, including highly sensitive competitive analysis based on Google's internal data as related to a specific developer, and detailed adjustments to that data performed by both Google's expert Plaintiff's expert. If publicly disclosed, it could provide app store competitors or competitors to that developer insight into Google's thinking about its value proposition to this developer.

846. **Page 338, Exhibit C1 (all figures in row named "Pass-Through Rate").** This information reflects and is calculated from internal, non-public Google financial data. Were this information to publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1           847.   **Page 339, Exhibit C2 (all figures in row named “Pass-Through Rate”)**. This  
2 information reflects and is calculated from internal, non-public Google financial data. Were this  
3 information to publicly revealed, it could cause Google competitive harm by giving competitors insight  
4 into confidential Google financial information.

5           848.   **Page 340, Exhibit C3 (all figures in row named “Pass-Through Rate”)**. This  
6 information reflects and is calculated from internal, non-public Google financial data. Were this  
7 information to publicly revealed, it could cause Google competitive harm by giving competitors insight  
8 into confidential Google financial information.

9           849.   **Page 341, Exhibit C4 (all figures in row named “Pass-Through Rate”)**. This  
10 information reflects and is calculated from internal, non-public Google financial data. Were this  
11 information to publicly revealed, it could cause Google competitive harm by giving competitors insight  
12 into confidential Google financial information.

13           850.   **Page 342-442, Exhibit 35a (text following “product\_id = “ in the title of each chart**  
14 **on each page)**. This text reflects non-public and confidential information regarding the identity of a  
15 specific non-party developer and developer-specific information derived from Google's transactional  
16 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
17 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
18 relationship with this developer (and potentially others), jeopardizing Google's future business  
19 opportunities with them.

20           851.   **Page 443-543, Exhibit 35b (text following “product\_id = “ in the title of each chart**  
21 **on each page)**. This text reflects non-public and confidential information regarding the identity of a  
22 specific non-party developer and developer-specific information derived from Google's transactional  
23 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
24 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
25 relationship with this developer (and potentially others), jeopardizing Google's future business  
26 opportunities with them.



1           852.   **Page 544-644, Exhibit 35c (text following “product\_id = “ in the title of each chart**  
2 **on each page).** This text reflects non-public and confidential information regarding the identity of a  
3 specific non-party developer and developer-specific information derived from Google's transactional  
4 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
5 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
6 relationship with this developer (and potentially others), jeopardizing Google's future business  
7 opportunities with them.

8           853.   **Page 645-745, Exhibit 36a (text following “product\_id = “ in the title of each chart**  
9 **on each page).** This text reflects non-public and confidential information regarding the identity of a  
10 specific non-party developer and developer-specific information derived from Google's transactional  
11 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
12 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
13 relationship with this developer (and potentially others), jeopardizing Google's future business  
14 opportunities with them.

15           854.   **Page 746-846, Exhibit 36b (text following “product\_id = “ in the title of each chart**  
16 **on each page).** This text reflects non-public and confidential information regarding the identity of a  
17 specific non-party developer and developer-specific information derived from Google's transactional  
18 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
19 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
20 relationship with this developer (and potentially others), jeopardizing Google's future business  
21 opportunities with them.

22           855.   **Page 847-947, Exhibit 36c (text following “product\_id = “ in the title of each chart**  
23 **on each page).** This text reflects non-public and confidential information regarding the identity of a  
24 specific non-party developer and developer-specific information derived from Google's transactional  
25 data. The developer identified in this Figure has a reasonable expectation that Google will maintain the  
26 confidentiality of data relating to its app on Google Play. Revealing that data would harm Google's  
27  
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1 relationship with this developer (and potentially others), jeopardizing Google's future business  
2 opportunities with them.

3 **Google's Motion to Exclude Opinions Offered by Hal Singer - Exhibit 4 [Dkt. No. 487-5]**  
4 **(Exhibit E4)**

5 856. **Exhibit 4, Page 162, Line 21 (between "less than" and "of Play Store")**. This table  
6 contains non-public and confidential data regarding the portion of U.S. consumers that participated in  
7 the Play Points program. This information is non-public and the Google Play product team treats it as  
8 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
9 making and business strategies employed by Google's app store competitors, for example by  
10 influencing how those app stores market themselves to U.S. developers and how they distinguish  
11 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of U.S.  
12 consumers that participate in and have redeemed Play Points could influence the negotiating strategies  
13 and tactics employed by app developers and other current and prospective counterparties with which  
14 Google does or may transact business.

15 857. **Exhibit 4, Page 167, Line 3 (between "talking about" and "percent savings"), Line**  
16 **6 (between "credit you between" and "and"; between "and" and "percent, I'm going by"), and**  
17 **Line 21 (between "the order of" and "percent")**. This text contains non-public and confidential data  
18 regarding the percentage of subsidy Plaintiffs' expert claims would be offered to consumers through  
19 the Play Points program in the but-for world, which is derived from confidential data. If revealed  
20 publicly, an app store competitor could make decisions about its own reward programs and the value  
21 of subsidies to offer consumers in order to better compete against Google Play and target those same  
22 consumers. For example, a competitor to Google Play would be able to use this information to meet or  
23 beat the subsidy offered by Google Play through its loyalty program, and use that information to draw  
24 customers away from Google Play.

25 858. **Exhibit 4, Page 167, Line 18 (between "subsidy of" and "you see many people")**.  
26 This text contains non-public and confidential data regarding the percentage of subsidy offered to  
27 consumers through the Play Points program, which is derived from confidential data. If revealed  
28

1 publicly, an app store competitor could make decisions about its own reward programs and the value  
2 of subsidies to offer consumers in order to better compete against Google Play and target those same  
3 consumers. For example, a competitor to Google Play would be able to use this information to meet or  
4 beat the subsidy offered by Google Play through its loyalty program, and use that information to draw  
5 customers away from Google Play.

6 859. **Exhibit 4, Page 168, Lines 11-12 (between “subsidy from, say” and “to”; between**  
7 **“to” and “right, that is”), and Line 15 (between “who are getting” and “off and you”).** This text  
8 contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert claims  
9 would be offered to consumers through the Play Points program in the but-for world, as well as the  
10 actual percentage of subsidy offered to consumers through the Play Points program, which is derived  
11 from confidential data. If revealed publicly, an app store competitor could make decisions about its  
12 own reward programs and the value of subsidies to offer consumers in order to better compete against  
13 Google Play and target those same consumers. For example, a competitor to Google Play would be  
14 able to use this information to meet or beat the subsidy offered by Google Play through its loyalty  
15 program, and use that information to draw customers away from Google Play.

16 860. **Exhibit 4, Page 169, Line 23 (between “paltry” and “you know”).** This text contains  
17 non-public and confidential data regarding the percentage of subsidy offered to consumers through the  
18 Play Points program, which is derived from confidential data. If revealed publicly, an app store  
19 competitor could make decisions about its own reward programs and the value of subsidies to offer  
20 consumers in order to better compete against Google Play and target those same consumers. For  
21 example, a competitor to Google Play would be able to use this information to meet or beat the subsidy  
22 offered by Google Play through its loyalty program, and use that information to draw customers away  
23 from Google Play.

24 861. **Exhibit 4, Page 173, Line 16 (between “one it gets” and “I mean”).** This text  
25 contains non-public and confidential data regarding the magnitude of percentage of subsidy Plaintiffs’  
26 expert claims would be offered to consumers through the Play Points program in the but-for world, as  
27 well as the actual percentage of subsidy offered to consumers through the Play Points program, which  
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1 is derived from confidential data. If revealed publicly, an app store competitor could make decisions  
2 about its own reward programs and the value of subsidies to offer consumers in order to better compete  
3 against Google Play and target those same consumers. For example, a competitor to Google Play  
4 would be able to use this information to meet or beat the subsidy offered by Google Play through its  
5 loyalty program, and use that information to draw customers away from Google Play.

6 862. **Exhibit 4, Page 178, Line 19 (between “estimates” and “more in damages”), and**  
7 **Lines 21-22 (between “know if it’s” and “but I”).** This information reflects and is calculated from  
8 internal, non-public Google financial data. Were this information to be publicly revealed, it could  
9 cause Google competitive harm by giving competitors insight into confidential Google financial  
10 information.

11 863. **Exhibit 4, Page 178, Line 25 (between “maybe” and “under play Points”; between**  
12 **“up to” and end of sentence).** This text contains non-public and confidential data regarding the  
13 magnitude of percentage of subsidy Plaintiffs’ expert claims would be offered to consumers through  
14 the Play Points program in the but-for world, as well as the actual percentage of subsidy offered to  
15 consumers through the Play Points program, which is derived from confidential data. If revealed  
16 publicly, an app store competitor could make decisions about its own reward programs and the value  
17 of subsidies to offer consumers in order to better compete against Google Play and target those same  
18 consumers. For example, a competitor to Google Play would be able to use this information to meet or  
19 beat the subsidy offered by Google Play through its loyalty program, and use that information to draw  
20 customers away from Google Play.

21 864. **Exhibit 4, Page 179, Line 3 (between “So” and “sounds like a lot”).** This information  
22 reflects and is calculated from internal, non-public Google financial data. Were this information to be  
23 publicly revealed, it could cause Google competitive harm by giving competitors insight into  
24 confidential Google financial information.

25 865. **Exhibit 4, Page 179, Lines 5-6 (between “between say” and “subsidy”; between “to**  
26 **a” and “subsidy”).** This information reflects and is calculated from internal, non-public Google  
27  
28

1 financial data. Were this information to be publicly revealed, it could cause Google competitive harm  
2 by giving competitors insight into confidential Google financial information.

3 866. **Exhibit 4, Page 180, Line 4 (between “damages at the” and “that you have”).** This  
4 information reflects and is calculated from internal, non-public Google financial data. Were this  
5 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
6 insight into confidential Google financial information.

7 867. **Exhibit 4, Page 180, Line 12-14 (between “between the” and “of the Play Points”;**  
8 **between “and” and “which is about”; between “which is about” and “should we”).** This  
9 information reflects and is calculated from internal, non-public Google financial data. Were this  
10 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
11 insight into confidential Google financial information.

12 **Google’s Motion to Exclude Opinions Offered by Hal Singer - Exhibit 6 [Dkt. No. 487-7]**  
13 **(Exhibit E5)**

14 868. **Page 13, Paragraph 21 (between “purchases of just” and “over the time”; between**  
15 **“less than” and “of aggregate purchases”; between “represent approximately” and “percent”).**  
16 This information reflects and is calculated from internal, non-public Google financial data. Google  
17 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
18 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
19 Google competitive harm by giving competitors insight into confidential Google financial information.  
20 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
21 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
22 Google to gain an unfair advantage against Google.

23 869. **Page 13, Paragraph 20, Note 54 (between “price of” and “may have increased”;**  
24 **between “developer released an” and “See”; between “See” and end of sentence).** The disclosure  
25 of app developers’ highly confidential information would significantly harm app developers’ business.  
26 For example, app developers’ competitors could leverage this information to reap an unearned  
27 competitive advantage. They could exploit this information—that they otherwise would not have  
28

1 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
2 fruition, app developers’ proactively maintains the confidentiality of its strategic information, only  
3 disclosing it to a select group of individuals on an as-needed basis.

4 870. **Page 15, Figure 1 (entire chart).** This information reflects and is calculated from  
5 internal, non-public Google financial data. Google spends significant resources compiling and  
6 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
7 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
8 competitors insight into confidential Google financial information. Further, this information reflects  
9 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
10 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
11 against Google.

12 871. **Page 16, Paragraph 28 (between “account for just” and “percent”).** This  
13 information reflects and is calculated from internal, non-public Google financial data. Google spends  
14 significant resources compiling and maintaining this valuable data, which is non-public, and if  
15 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
16 Google competitive harm by giving competitors insight into confidential Google financial information.  
17 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
18 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
19 Google to gain an unfair advantage against Google.

20 872. **Page 16, Figure 2 (entire chart).** This information reflects and is calculated from  
21 internal, non-public Google financial data. Google spends significant resources compiling and  
22 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
23 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
24 competitors insight into confidential Google financial information. Further, this information reflects  
25 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
26 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
27 against Google.

1           873.   **Page 17, Paragraph 30 (between “account for” and “of consumer expenditure”).**

2 This information reflects and is calculated from internal, non-public Google financial data. Google  
3 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
4 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
5 Google competitive harm by giving competitors insight into confidential Google financial information.  
6 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
7 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
8 Google to gain an unfair advantage against Google.

9           874.   **Page 17, Paragraph 32 (between “account for” and “of consumer expenditure”).**

10 This information reflects and is calculated from internal, non-public Google financial data. Google  
11 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
12 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
13 Google competitive harm by giving competitors insight into confidential Google financial information.  
14 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
15 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
16 Google to gain an unfair advantage against Google.

17           875.   **Page 18, Figure 3 (entire chart).** This information reflects and is calculated from  
18 internal, non-public Google financial data. Google spends significant resources compiling and  
19 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
20 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
21 competitors insight into confidential Google financial information. Further, this information reflects  
22 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
23 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
24 against Google.

25           876.   **Page 19, Paragraph 37 (between “comes to” and “in 2021”; between “was**  
26 **approximately” and end of sentence).** This information reveals Google's internal non-public profit,  
27 revenue, and financial calculations. These data sets are not otherwise publicly reported by the company  
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1 and their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
2 advantage. Google's competitors could improperly utilize this internal, non-public data to modify or  
3 augment their business operations in an effort to compete unfairly against Google. Moreover, visibility  
4 into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper  
5 insight into the financial health and future outlook of the Play business, which also arguably gives  
6 Google's competitors an unfair advantage.

7 877. **Page 20, Figure 4 (entire chart).** This text reflects revenue, operating profit, and gross  
8 profit margin figures calculated or derived from Google's financial data which is non-public  
9 information, and if revealed to competitors and potential business counterparties, could be used to  
10 disadvantage Google. For example, if competitor platforms became aware of this information they  
11 could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more  
12 effectively with Google Play.

13 878. **Page 20, Paragraph 38 (between “approximately” and “percent of aggregate”).**  
14 This information contains non-public and confidential data regarding the service fee on Google Play.  
15 This information has never been disclosed publicly and the Google Play product team treats it as  
16 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
17 making and business strategies employed by Google’s app store competitors, for example by  
18 influencing how those app stores market themselves to U.S. developers and how they distinguish  
19 themselves from Google Play in the eyes of U.S. developers. This information reflects and is  
20 calculated from internal, non-public Google financial data. Google spends significant resources  
21 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
22 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
23 by giving competitors insight into confidential Google financial information. Further, this information  
24 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
25 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
26 advantage against Google.

1           879.   **Page 20, Paragraph 38, Note 67 (between “approximately” and “I then divided”;**  
2 **between “equal to approximately” and end of sentence).** This information contains non-public and  
3 confidential data regarding consumer spending on Google Play. This information has never been  
4 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
5 revealed, this information could influence the competitive decision-making and business strategies  
6 employed by Google’s app store competitors, for example by influencing how those app stores market  
7 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
8 U.S. developers. This information reflects and is calculated from internal, non-public Google financial  
9 data. Google spends significant resources compiling and maintaining this valuable data, which is non-  
10 public, and if revealed to competitors and potential business counterparties, could be used to  
11 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
12 Google financial information. Further, this information reflects sensitive, highly confidential  
13 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
14 counterparties in negotiations with Google to gain an unfair advantage against Google.

15           880.   **Page 24, Paragraph 51, Note 93 (between “approximately” and “in the actual**  
16 **world”;** **between “actual world to” and “in the but-for world”).** This text contains non-public and  
17 confidential information relating to the service fee rate Google would charge in a but-for world  
18 according to Plaintiffs' expert, which is derived from Google's highly confidential transactional data. If  
19 disclosed, this data point could be used by potential counterparties negotiating with Google as a  
20 benchmark, weakening Google's competitive position.

21           881.   **Page 25, Paragraph 54 (between “even today” and “and the Amazon”; between**  
22 **“discounts” and “on Google Android devices”).** This text describes confidential and non-public  
23 details about a non-party app store’s and Google’s consumer discount programs. If those details were  
24 revealed to competitors and potential business counterparties, they could use that information to  
25 disadvantage Google.

26           882.   **Page 44, Paragraph 110 (between “nearly” and “percent of GMS”; between**  
27 **“nearly” and “percent of new device”).** This information contains non-public information regarding  
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1 Google's confidential non-public internal strategic considerations related to creating value for and  
2 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
3 Disclosure of this information would adversely impact Google's current competitive position by  
4 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
5 away from Google.

6 883. Page 46, Paragraph 118 (between "show that" and "percent of devices"; between  
7 "and" and "percent in the United States"). This information contains non-public and confidential  
8 data regarding consumer behavior regarding application downloads and installation on Google Play.  
9 This information has never been disclosed publicly and the Google Play product team treats it as  
10 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
11 making and business strategies employed by Google's app store competitors, for example by  
12 influencing how those app stores market themselves to U.S. developers and how they distinguish  
13 themselves from Google Play in the eyes of U.S. developers.

14 884. Page 53, Paragraph 143 (between "commitment from" and "not to enter"; between  
15 "threat of" and "302 Although"; between "Google and" and "did reach"). This information  
16 contains non-public and confidential data regarding negotiations and agreements with app developers  
17 on Google Play. This information has never been disclosed publicly and the Google Play product team  
18 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
19 decision-making and business strategies employed by Google's app store competitors, for example by  
20 influencing how those app stores market themselves to U.S. developers and how they distinguish  
21 themselves from Google Play in the eyes of U.S. developers. The disclosure of app developers' highly  
22 confidential information would significantly harm app developers' business. For example, app  
23 developers' competitors could leverage this information to reap an unearned competitive advantage.  
24 They could exploit this information—that they otherwise would not have access to—to inform their  
25 own business strategies. To prevent these competitive harms from coming to fruition, app developers'  
26 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
27 of individuals on an as-needed basis.

885. **Page 53, Paragraph 143, Note 303 (between “indicating that” and “did “reject[]”; between “would have barred” and “from distributing”; between “certain point did” and “and Google”; between “agreement regarding” and “A Yes.”; between “A Yes.” And “has agreed”; between “Google communicated to” and “that it planned”; between “commitment from” and “not to distribute”; between “conclusion of” and “Alley-Oop trial”; between “explaining that” and “is “[w]illing to”; between “continue testing” and “see also Rasanen Dep. 204:9-16”).** This information contains non-public and confidential data regarding negotiations and agreements with app developers on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. The disclosure of app developers’ highly confidential information would significantly harm app developers’ business. For example, app developers’ competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, app developers’ proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

886. **Page 53, Paragraph 144 (between “Google offered ‘Alley-Oop” and “at significant cost”; between “disincentivize and slow” and “progress”; between “app distribution” and “304 Dr. Gentzkow”; between “dispute that Alley-Oop” and “Nor does”; between “to deter” and “from distributing”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target

1 Google's developer partners and offer specific deal terms designed to undercut those offered by  
2 Google.

3 887. **Page 53, Paragraph 144, Note 304 (between “to help” and “remain”; between**  
4 **“avoid” and “performing direct installs”).** This text contains confidential, non-public information  
5 regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting  
6 to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this  
7 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
8 decision-making, which, for example, could give a competitor or potential business partner unfair  
9 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
10 this non-party information to unfairly target Google’s developer partners. The disclosure of app  
11 developers' highly confidential information would significantly harm app developers' business. For  
12 example, app developers' competitors could leverage this information to reap an unearned competitive  
13 advantage. They could exploit this information—that they otherwise would not have access to—to  
14 inform their own business strategies. To prevent these competitive harms from coming to fruition, app  
15 developers' proactively maintains the confidentiality of its strategic information, only disclosing it to a  
16 select group of individuals on an as-needed basis.

17 888. **Page 53, Paragraph 144, Note 305 (between “assessed this” and “GOOG-PLAY-**  
18 **007379918”; between “describing Alley-Oop” and “and hurting [Google’s]”).** This text contains  
19 confidential, non-public information regarding non-party developers, and implicates the non-parties’  
20 confidentiality interests by purporting to reveal the nonparties’ confidential statements made during  
21 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
22 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
23 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
24 Google’s competitors could use this non-party information to unfairly target Google’s developer  
25 partners. The disclosure of developers' highly confidential information would significantly harm app  
26 developers' business. For example, developers' competitors could leverage this information to reap an  
27 unearned competitive advantage. They could exploit this information—that they otherwise would not  
28

1 have access to—to inform their own business strategies. To prevent these competitive harms from  
 2 coming to fruition, developers proactively maintain the confidentiality of its strategic information, only  
 3 disclosing it to a select group of individuals on an as-needed basis.

4 889. Page 53-54, Paragraph 145 (between “absent” and “and into Google Play”;  
 5 between “characterize the pre-Alley-Oop” and “as “cumbersome”; between “experience of  
 6 using” and “in particular”; between “experiments in” and “in 2016”; between “widespread” and  
 7 “a process”; between “Google evidently intended Alley-Oop” and end of sentence). This text  
 8 contains confidential, non-public information regarding Google’s agreements with non-party  
 9 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
 10 as it reveals strategic decision-making which, for example, could give a competitor or potential  
 11 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
 12 competitors could use this non-party information to unfairly target Google's developer partners and  
 13 offer specific deal terms designed to undercut those offered by Google. The disclosure of developers'  
 14 highly confidential information would significantly harm developers' business. For example,  
 15 developers' competitors could leverage this information to reap an unearned competitive advantage.  
 16 They could exploit this information—that they otherwise would not have access to—to inform their  
 17 own business strategies. To prevent these competitive harms from coming to fruition, developers  
 18 proactively maintain the confidentiality of its strategic information, only disclosing it to a select group  
 19 of individuals on an as-needed basis.

20 890. Page 54, Paragraph 145, Note 308 (between “users for” and “[T]he question is”;  
 21 between “how best to structure Alley-Oop” and “to avoid”; between “If we give” and “Alley-Oop  
 22 without getting”; between “pause their” and “we aren’t slowing”). This text contains confidential,  
 23 non-public information regarding non-party developers, and implicates the non-parties’ confidentiality  
 24 interests by purporting to reveal the nonparties’ confidential statements made during negotiations.  
 25 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 26 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
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1 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
2 competitors could use this non-party information to unfairly target Google's developer partners.

3 891. **Page 54, Paragraph 146 (between "I understand that" and "without the user";**  
4 **between "I understand that" and "raised concerns").** This text contains confidential, non-public  
5 information regarding non-party developers, and implicates the non-parties' confidentiality interests by  
6 purporting to reveal the nonparties' confidential statements made during negotiations. Further,  
7 disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
8 strategic decision-making, which, for example, could give a competitor or potential business partner  
9 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
10 could use this non-party information to unfairly target Google's developer partners. The disclosure of  
11 developers' highly confidential information would significantly harm developers' business. For  
12 example, developers' competitors could leverage this information to reap an unearned competitive  
13 advantage. They could exploit this information—that they otherwise would not have access to—to  
14 inform their own business strategies. To prevent these competitive harms from coming to fruition,  
15 developers proactively maintain the confidentiality of its strategic information, only disclosing it to a  
16 select group of individuals on an as-needed basis.

17 892. **Page 54, Paragraph 146, Note 309 (between "implementing the Alley-Oop" and**  
18 **"was using copies").** This text contains confidential, non-public information regarding non-party  
19 developers, and implicates the non-parties' confidentiality interests by purporting to reveal the  
20 nonparties' confidential statements made during negotiations. Further, disclosure of this non-public  
21 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
22 which, for example, could give a competitor or potential business partner unfair leverage in competing  
23 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
24 information to unfairly target Google's developer partners. The disclosure of developers' highly  
25 confidential information would significantly harm developers' business. For example, developers'  
26 competitors could leverage this information to reap an unearned competitive advantage. They could  
27 exploit this information—that they otherwise would not have access to—to inform their own business  
28



1 strategies. To prevent these competitive harms from coming to fruition, developers proactively  
 2 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
 3 individuals on an as-needed basis.

4 893. Page 54, Paragraph 146, Note 310 (between “during negotiations” and  
 5 “complained”; between “Google’s Alley-Oop” and “harmed user experience”; between  
 6 “introduced” and “See GOOG-PLAY-007380405 at -413”; between “characterizing” and  
 7 “feedback on the overlay”; between “include that” and end of sentence). This text contains  
 8 confidential, non-public information regarding non-party developers, and implicates the non-parties’  
 9 confidentiality interests by purporting to reveal the nonparties’ confidential statements made during  
 10 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 11 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 12 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 13 Google’s competitors could use this non-party information to unfairly target Google’s developer  
 14 partners. The disclosure of developers’ highly confidential information would significantly harm  
 15 developers’ business. For example, developers’ competitors could leverage this information to reap an  
 16 unearned competitive advantage. They could exploit this information—that they otherwise would not  
 17 have access to—to inform their own business strategies. To prevent these competitive harms from  
 18 coming to fruition, developers proactively maintain the confidentiality of its strategic information, only  
 19 disclosing it to a select group of individuals on an as-needed basis.

20 894. Page 54, Paragraph 147 (between “developers such as” and “from building  
 21 alternative”; between “distribution mechanisms, Alley-Oop” and “-and it apparently”; between  
 22 “offered to these” and “312 Google”; between “Google offering Alley-Oop” and “and could only  
 23 recall”; between “Google signing” and “313 Dr. Gentzkow”; between “third-party apps via  
 24 Alley-Oop” and end of sentence). This text contains confidential, non-public information regarding  
 25 Google’s agreements with non-party developers. Disclosure of this non-public information is likely to  
 26 result in competitive harm to Google, as it reveals strategic decision-making which, for example, could  
 27 give a competitor or potential business partner unfair leverage in competing against or negotiating with  
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Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

895. **Page 54-55, Paragraph 147, Note 314 (between “posed by” and “Gentzkow Report ¶591”; between “installed by” and “were more likely”; between “one occasion that” and “GOOG-PLAY-009261089 at -091-092.”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

896. **Page 55, Paragraph 148 (between “at incentivizing” and “in favor of”; “Google’s and” and “own documents”; “concedes, when” and “was launched in 2015”; between “accounted for” and “percent of”; between “words, nearly” and “of the Play”; between “In 2014” and “of all indirect”; between “and approximately” and “percent of all App”; between “confirms that” and “indirect App installs”; between “noted that” and “of the mobile”; between “In 2020” and “estimated that it”; between “it directed” and “through the Play”; between “accounting for” and “percent of Play’s”; between “and \$” and “in consumer spend.”).** This text describes confidential and non-public details about app discovery, apps and consumer spend - as well as identifying non-party Google Play partners. If that information were revealed to competitors and potential business counterparties, they could use that information to disadvantage Google. For example, if other app developers became aware of this information, they could use it to inform their negotiation strategies

1 and as leverage in negotiations with Google, to the detriment of Google and the app developer business  
2 partner alike (e.g., by demanding that Google provide the same terms to them).

3 897. Page 55, Paragraph 148, Note 315 (between “accounted for” and “percent”;  
4 between “installs and” and “percent”; between “figures are” and “percent”; between “and” and  
5 “percent. Id. at -124.R.”). This information contains non-public information regarding Google’s  
6 confidential non-public internal strategic considerations related to creating value for and attracting  
7 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
8 this information would adversely impact Google’s current competitive position by enabling Google’s  
9 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

10 898. Page 55, Paragraph 148, Note 318 (between “318.” And “\_000015465, at 5-6.”). The  
11 disclosure of developers' highly confidential information would significantly harm developers'  
12 business. For example, developers' competitors could leverage this information to reap an unearned  
13 competitive advantage. They could exploit this information—that they otherwise would not have  
14 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
15 fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing  
16 it to a select group of individuals on an as-needed basis.

17 899. Page 55, Paragraph 149 (between “as early as 2016” and “was using”). This  
18 information contains non-public and confidential data regarding developer behavior regarding app  
19 installation ads on Google Play. This information has never been disclosed publicly and the Google  
20 Play product team treats it as strictly confidential. If publicly revealed, this information could influence  
21 the competitive decision-making and business strategies employed by Google’s app store competitors,  
22 for example by influencing how those app stores market themselves to U.S. developers and how they  
23 distinguish themselves from Google Play in the eyes of U.S. developers. The disclosure of developers'  
24 highly confidential information would significantly harm developers' business. For example,  
25 developers' competitors could leverage this information to reap an unearned competitive advantage.  
26 They could exploit this information—that they otherwise would not have access to—to inform their  
27 own business strategies. To prevent these competitive harms from coming to fruition, developers

1 proactively maintain the confidentiality of its strategic information, only disclosing it to a select group  
2 of individuals on an as-needed basis.

3 900. **Page 56, Figure 6 (between “Figure 6” and end of sentence; entire chart).** This text  
4 contains confidential, non-public information regarding non-party developers, and implicates the non-  
5 party’s confidentiality interests, by revealing the identity of Google business partners who are not party  
6 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
7 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
8 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
9 decision-making, which, for example, could give a competitor or potential business partner unfair  
10 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
11 this non-party information to unfairly target Google’s developer partners.

12 901. **Page 56, Paragraph 150 (between “incentivize” and “to slow or halt”; between “a**  
13 **firm with” and “resources, experience”; between “To date,” and “has yet to deploy”; between**  
14 **“indicates that” and “is using a version”; between “of Google’s Alley-Oop” and end of the**  
15 **sentence).** This text contains confidential, non-public information regarding Google’s agreements with  
16 non-party developers. Disclosure of this non-public information is likely to result in competitive harm  
17 to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
18 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
19 Google’s competitors could use this non-party information to unfairly target Google's developer  
20 partners and offer specific deal terms designed to undercut those offered by Google. This text contains  
21 confidential, non-public information regarding non-party developers, and implicates the non-party’s  
22 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
23 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
24 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
25 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
26 decision-making, which, for example, could give a competitor or potential business partner unfair  
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1 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
2 this non-party information to unfairly target Google’s developer partners.

3       902.    **Page 56, Paragraph 150, Note 319 (between “Gentzkow Report ¶596” and**  
4 **“continues to explore”; between “confirming that” and “currently uses”; between “version of”**  
5 **and “for a percentage”).** This text contains confidential, non-public information regarding Google’s  
6 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
7 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
8 competitor or potential business partner unfair leverage in competing against or negotiating with  
9 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
10 Google's developer partners and offer specific deal terms designed to undercut those offered by  
11 Google. This text contains confidential, non-public information regarding non-party developers, and  
12 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
13 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
14 maintain the confidentiality of contractual terms and its own confidential statements made during  
15 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
16 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
17 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
18 Google’s competitors could use this non-party information to unfairly target Google’s developer  
19 partners.

20       903.    **Page 57, Paragraph 152 (between “accounts for only” and “percent”; between**  
21 **“Galaxy Store is” and “330 Dr. Gentzkow”; between “Galaxy Store is about” and “percent”;**  
22 **between “of these are” and “devices”; between “with the” and “as seen below”; between “Aside**  
23 **from” and “the remaining”).** This text contains confidential, non-public information regarding non-  
24 party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of  
25 Google business partners who are not party to this litigation, and who has a reasonable expectation that  
26 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
27 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
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1 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
2 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
3 Google’s competitors could use this non-party information to unfairly target Google’s developer  
4 partners. The disclosure of developers' highly confidential information would significantly harm  
5 developers' business. For example, developers' competitors could leverage this information to reap an  
6 unearned competitive advantage. They could exploit this information—that they otherwise would not  
7 have access to—to inform their own business strategies. To prevent these competitive harms from  
8 coming to fruition, developers proactively maintain the confidentiality of its strategic information, only  
9 disclosing it to a select group of individuals on an as-needed basis.

10       904.   **Page 57, Paragraph 152, Note 331 (between “showing, for” and “devices”; between**  
11 **“annual spend of” and “per user”; between “device in the” and “compared with”; between**  
12 **“compared with” and “in the Play Store”).** This text contains confidential, non-public information  
13 regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing  
14 the identity of Google business partners who are not party to this litigation, and who has a reasonable  
15 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
16 statements made during negotiations. Further, disclosure of this non-public information is likely to  
17 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
18 could give a competitor or potential business partner unfair leverage in competing against or  
19 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
20 unfairly target Google’s developer partners. The disclosure of developers' highly confidential  
21 information would significantly harm developers' business. For example, developers' competitors  
22 could leverage this information to reap an unearned competitive advantage. They could exploit this  
23 information—that they otherwise would not have access to—to inform their own business strategies.  
24 To prevent these competitive harms from coming to fruition, developers proactively maintain the  
25 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
26 needed basis.

1           905.   **Page 58, Figure 7 (entire chart).** This information contains non-public and  
2 confidential data regarding third party app store data on Android and Google Play. This information  
3 has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
4 publicly revealed, this information could influence the competitive decision-making and business  
5 strategies employed by Google’s app store competitors, for example by influencing how those app  
6 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
7 the eyes of U.S. developers.

8           906.   **Page 58, Paragraph 153 (between “on less than” and “percent of active”; between**  
9 **“that it offers” and “consumer subsidies”; between “(almost” and “percent)”; between “offering**  
10 **a” and the end of the sentence.).** This information reflects and is calculated from internal, non-public  
11 Google financial data - specifically financial data about Google’s consumer subsidies in comparison  
12 with another app store. Google spends significant resources compiling and maintaining this valuable  
13 data, which is non-public, and if revealed to competitors and potential business counterparties, could  
14 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
15 confidential Google financial information. Further, this information reflects sensitive, highly  
16 confidential characterizations by Google's internal business teams that, if revealed, could be referenced  
17 by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

18           907.   **Page 59, Paragraph 154 (between “demonstrates the” and “penetration”).** This  
19 information contains non-public and confidential data regarding third party app store data on Android  
20 and Google Play. This information has never been disclosed publicly and the Google Play product  
21 team treats it as strictly confidential. If publicly revealed, this information could influence the  
22 competitive decision-making and business strategies employed by Google’s app store competitors, for  
23 example by influencing how those app stores market themselves to U.S. developers and how they  
24 distinguish themselves from Google Play in the eyes of U.S. developers.

25           908.   **Page 59, Figure 8 (entire chart).** This information contains non-public and  
26 confidential data regarding third party app store data on Android and Google Play. This information  
27 has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
28



publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

909. **Page 59 (Source, between “package names” and “The gray line”; between “devices with” and “At some points”; between “in time the” and “may have included”; between “included the” and “while at others”).** The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

910. **Page 60, Paragraph 157 (between “Google talked with” and end of the sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the Google and nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

911. **Page 61, Paragraph 162 (between “occurred via” and “and that”; between “of the” and “of users”; between “acquisition channel” and “use Google Play”).** This information contains non-public and confidential data regarding sideloading applications on Android. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app

1 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
2 the eyes of U.S. developers.

3 912. **Page 63, Figure 10 (entire chart).** This information contains non-public and  
4 confidential data regarding application installation behavior on Android. This information has never  
5 been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
6 revealed, this information could influence the competitive decision-making and business strategies  
7 employed by Google's app store competitors, for example by influencing how those app stores market  
8 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
9 U.S. developers..

10 913. **Page 63, Paragraph 164, Note 358 (between "Describing" and "as offering";**  
11 **between "[u]p to" and "that preload Play"; between "Describing RSA as" and "See also GOOG-**  
12 **PLAY- 004494430.C"; between "Google" and "in exchange for").** This text contains confidential,  
13 non-public information regarding Google's agreements with non-party OEMs. Disclosure of this non-  
14 public information is likely to result in competitive harm to Google, as it reveals strategic decision-  
15 making which, for example, could give a competitor or potential business partner unfair leverage in  
16 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
17 party information to unfairly target Google's OEM partners and offer specific deal terms designed to  
18 undercut those offered by Google.

19 914. **Page 64, Paragraph 165 (between "applied to only" and "percent"; between**  
20 **"about" and "percent"; between "over" and "percent"; between "sometime in" and**  
21 **"indicating").** This text contains confidential, non-public information regarding Google's agreements  
22 with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm  
23 to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
24 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
25 Google's competitors could use this non-party information to unfairly target Google's OEM partners  
26 and offer specific deal terms designed to undercut those offered by Google.

1           **915. Page 65, Figure 11 (entire chart; Source, between “GOOG-PLAY-**  
 2 **011657424.xlsx.” and end of sentence).** This information contains non-public information regarding  
 3 Google’s confidential non-public internal strategic considerations related to creating value for and  
 4 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
 5 Disclosure of this information would adversely impact Google’s current competitive position by  
 6 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
 7 away from Google. This text contains confidential, non-public information regarding Google’s  
 8 agreements with non-party OEMs. Disclosure of this non-public information is likely to result in  
 9 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
 10 competitor or potential business partner unfair leverage in competing against or negotiating with  
 11 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
 12 Google's OEM partners and offer specific deal terms designed to undercut those offered by Google.

13           **916. Page 65-66, Paragraph 166 (between “these contracts” and “361 Many OEMs”).**  
 14 This information contains non-public information regarding Google’s confidential non-public internal  
 15 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 16 This information has never been disclosed publicly. Disclosure of this information would adversely  
 17 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 18 confidential strategies in an effort to attract developers away from Google. This text contains  
 19 confidential, non-public information regarding Google’s agreements with non-party OEMs. Disclosure  
 20 of this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 21 decision-making which, for example, could give a competitor or potential business partner unfair  
 22 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 23 this non-party information to unfairly target Google's OEM partners and offer specific deal terms  
 24 designed to undercut those offered by Google.

25           **917. Page 66, Paragraph 166, Note 363 (between “preloaded on” and “of Android**  
 26 **devices”).** This text contains confidential, non-public information regarding Google’s agreements with  
 27 non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to  
 28

Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's OEM partners and offer specific deal terms designed to undercut those offered by Google.

918. **Page 66, Paragraph 167 (between “same document” and “364 The Executive Summary”; between “fine-tuning” and “to protect Google”; between “describes [o]ffer[ing]” and “...to secure Play”).** This text contains confidential, non-public information regarding Google's agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's OEM partners and offer specific deal terms designed to undercut those offered by Google. This text contains confidential, non-public information regarding non-party OEMs, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's OEM partners.

919. **Page 66, Paragraph 167, Note 366 (between “specifying” and “Play revenue”; between “for” and “for”; between “for” and “Id. at -198”; between “spending the” and “in 2023”; between “in 2023” and “specifying”; between “specifying” and “million in revenue”; between “sharing on” and “comprised of”; between “comprised of” and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business

1 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 2 competitors could use this non-party information to unfairly target Google's OEM partners and offer  
 3 specific deal terms designed to undercut those offered by Google. This text contains confidential, non-  
 4 public information regarding non-party OEMs, and implicates the non-party's confidentiality interests,  
 5 by revealing the identity of Google business partners who are not party to this litigation, and who has a  
 6 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
 7 confidential statements made during negotiations. Further, disclosure of this non-public information is  
 8 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
 9 example, could give a competitor or potential business partner unfair leverage in competing against or  
 10 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
 11 unfairly target Google's OEM partners.

12 **920. Page 66, Paragraph 168 (between beginning of sentence and “protects against”;**  
 13 **between “expected to make” and “370 Google”; between “on the order of” and end of sentence).**  
 14 This text contains confidential, non-public information regarding Google's agreements with non-party  
 15 OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it  
 16 reveals strategic decision-making which, for example, could give a competitor or potential business  
 17 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 18 competitors could use this non-party information to unfairly target Google's OEM partners and offer  
 19 specific deal terms designed to undercut those offered by Google.

20 **921. Page 66, Paragraph 168, Note 371 (between “between” and “to OEMs”).** This text  
 21 contains confidential, non-public information regarding Google's agreements with non-party OEMs.  
 22 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
 23 strategic decision-making which, for example, could give a competitor or potential business partner  
 24 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
 25 could use this non-party information to unfairly target Google's OEM partners and offer specific deal  
 26 terms designed to undercut those offered by Google. This information reveals Google's internal non-  
 27 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
 28

1 by the company and their disclosure is likely to cause Google competitive harm and give its  
 2 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
 3 public data to modify or augment their business operations in an effort to compete unfairly against  
 4 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
 5 Google's competitors improper insight into the financial health and future outlook of the Play business,  
 6 which also arguably gives Google's competitors an unfair advantage.

7       **922. Page 71, Figure 12 (entire chart).** This information reveals Google's internal non-  
 8 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
 9 by the company and their disclosure is likely to cause Google competitive harm and give its  
 10 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
 11 public data to modify or augment their business operations in an effort to compete unfairly against  
 12 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
 13 Google's competitors improper insight into the financial health and future outlook of the Play business,  
 14 which also arguably gives Google's competitors an unfair advantage.

15       **923. Page 75, Paragraph 192 (between “Play Store’s” and “to”; between “to” and**  
 16 **“percent share”).** This information contains non-public and confidential data regarding consumer  
 17 spending data on Google Play. This information has never been disclosed publicly and the Google Play  
 18 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
 19 competitive decision-making and business strategies employed by Google’s app store competitors, for  
 20 example by influencing how those app stores market themselves to U.S. developers and how they  
 21 distinguish themselves from Google Play in the eyes of U.S. developers.

22       **924. Page 82, Paragraph 208 (between “[o]nly about” and “of all U.S.”).** This  
 23 information contains non-public information regarding Google’s confidential non-public internal  
 24 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 25 This information has never been disclosed publicly. Disclosure of this information would adversely  
 26 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 27 confidential strategies in an effort to attract developers away from Google.

1           **925. Page 84, Paragraph 211, Note 467 (between “iOS is about” and “for owners”;**  
2 **between “Android is about” and “for lower-priced”).** This information contains non-public and  
3 confidential data regarding consumer behavior regarding app stores on Google Play. This information  
4 has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
5 publicly revealed, this information could influence the competitive decision-making and business  
6 strategies employed by Google’s app store competitors, for example by influencing how those app  
7 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
8 the eyes of U.S. developers. In addition, revealing the number of U.S. developers that distribute apps  
9 on Google Play could influence the negotiating strategies and tactics employed by app developers and  
10 other current and prospective counterparties with which Google does or may transact business.

11           **926. Page 88, Paragraph 224 (between “margin of” and “percent”).** This information  
12 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
13 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
14 competitors and potential business counterparties, could be used to disadvantage and cause Google  
15 competitive harm by giving competitors insight into confidential Google financial information.  
16 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
17 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
18 Google to gain an unfair advantage against Google.

19           **927. Page 88, Paragraph 224, Note 502 (between “Equal to” and “See Singer Merits**  
20 **Report”).** This information reflects and is calculated from internal, non-public Google financial data.  
21 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
22 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
23 cause Google competitive harm by giving competitors insight into confidential Google financial  
24 information. Further, this information reflects sensitive, highly confidential characterizations by  
25 Google's internal business teams that, if revealed, could be referenced by potential counterparties in  
26 negotiations with Google to gain an unfair advantage against Google.



1           **928. Page 88, Paragraph 224, Note 506 (between “marginal costs are” and “Tucker**  
 2 **Report”)**. This information reflects and is calculated from internal, non-public Google financial data.  
 3 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
 4 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
 5 cause Google competitive harm by giving competitors insight into confidential Google financial  
 6 information. Further, this information reflects sensitive, highly confidential characterizations by  
 7 Google's internal business teams that, if revealed, could be referenced by potential counterparties in  
 8 negotiations with Google to gain an unfair advantage against Google.

9           **929. Page 91, Paragraph 235 (between “subsidy of” and “percent”; between “third-**  
 10 **party devices” and “percent”)**. This information contains non-public information regarding Google’s  
 11 confidential non-public internal strategic considerations related to creating value for and attracting  
 12 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
 13 this information would adversely impact Google’s current competitive position by enabling Google’s  
 14 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

15           **930. Page 95, Paragraph 251 (between “Play Store’s” and “in operating profit”;**  
 16 **between “operating profit of” and “with an operating profit”; between “margin of” and**  
 17 **“percent”)**. This information reveals Google's internal non-public profit, revenue, and financial  
 18 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
 19 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
 20 competitors could improperly utilize this internal, non-public data to modify or augment their business  
 21 operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the  
 22 data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
 23 health and future outlook of the Play business, which also arguably gives Google's competitors an  
 24 unfair advantage.

25           **931. Page 95, Paragraph 251, Note 572 (between “will grow to” and “billion”).** This  
 26 information reveals Google's internal non-public profit, revenue, and financial calculations. These data  
 27 sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google  
 28

1 competitive harm and give its competitors an unfair advantage. Google's competitors could improperly  
 2 utilize this internal, non-public data to modify or augment their business operations in an effort to  
 3 compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
 4 multiple years) gives Google's competitors improper insight into the financial health and future outlook  
 5 of the Play business, which also arguably gives Google's competitors an unfair advantage.

6 932. Page 95, Paragraph 251, Note 573 (between “(excluding ads) of” and “and  
 7 operating profit”; between “and operating profit” and “for an operating profit”; between  
 8 “margin of” and “Subtracting”; between “margin for 2021 of” and end of sentence). This  
 9 information reveals Google's internal non-public profit, revenue, and financial calculations. These data  
 10 sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google  
 11 competitive harm and give its competitors an unfair advantage. Google's competitors could improperly  
 12 utilize this internal, non-public data to modify or augment their business operations in an effort to  
 13 compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
 14 multiple years) gives Google's competitors improper insight into the financial health and future outlook  
 15 of the Play business, which also arguably gives Google's competitors an unfair advantage.

16 933. Page 96, Paragraph 253 (between “that its LTV analyses” and “Dr. Skinner”). This  
 17 information contains non-public information regarding Google’s confidential non-public internal  
 18 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
 19 This information has never been disclosed publicly. Disclosure of this information would adversely  
 20 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
 21 confidential strategies in an effort to attract developers away from Google. This information reflects  
 22 and is calculated from internal, non-public Google financial data. Google spends significant resources  
 23 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
 24 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
 25 by giving competitors insight into confidential Google financial information. Further, this information  
 26 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if

1 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
2 advantage against Google.

3 934. Page 105, Appendix Table A1 (all numbers under column “Total”; all numbers  
4 under column “No Price Change”; all numbers under column “Price Increase”; all numbers  
5 under column “Price Decrease”). This information contains non-public information regarding  
6 Google’s confidential non-public internal strategic considerations related to creating value for and  
7 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
8 Disclosure of this information would adversely impact Google’s current competitive position by  
9 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
10 away from Google. This information reflects and is calculated from internal, non-public Google  
11 financial data. Google spends significant resources compiling and maintaining this valuable data,  
12 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
13 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
14 Google financial information. Further, this information reflects sensitive, highly confidential  
15 characterizations by Google’s internal business teams that, if revealed, could be referenced by potential  
16 counterparties in negotiations with Google to gain an unfair advantage against Google.

17 935. Page 106, Appendix Table A2 (all numbers under column “Total”; all numbers  
18 under column “No Price Change”; all numbers under column “Price Increase”; all numbers  
19 under column “Price Decrease”). This information contains non-public information regarding  
20 Google’s confidential non-public internal strategic considerations related to creating value for and  
21 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
22 Disclosure of this information would adversely impact Google’s current competitive position by  
23 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
24 away from Google. This information reflects and is calculated from internal, non-public Google  
25 financial data. Google spends significant resources compiling and maintaining this valuable data,  
26 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
27 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
28

Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

936. **Page 107, Appendix Table A3 (all numbers under column “Total”; all numbers under column “No Price Change”; all numbers under column “Price Increase”; all numbers under column “Price Decrease”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google. This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

937. **Page 108, Appendix Table A4 (all numbers under column “Total”; all numbers under column “No Price Change”; all numbers under column “Price Increase”; all numbers under column “Price Decrease”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google. This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used

1 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 2 Google financial information. Further, this information reflects sensitive, highly confidential  
 3 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
 4 counterparties in negotiations with Google to gain an unfair advantage against Google.

5       **938. Page 109, Appendix Table A5 (all numbers under column “Total”; all numbers**  
 6 **under column “No Price Change”; all numbers under column “Price Increase”; all numbers**  
 7 **under column “Price Decrease”).** This information contains non-public information regarding  
 8 Google’s confidential non-public internal strategic considerations related to creating value for and  
 9 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
 10 Disclosure of this information would adversely impact Google’s current competitive position by  
 11 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
 12 away from Google. This information reflects and is calculated from internal, non-public Google  
 13 financial data. Google spends significant resources compiling and maintaining this valuable data,  
 14 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
 15 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
 16 Google financial information. Further, this information reflects sensitive, highly confidential  
 17 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
 18 counterparties in negotiations with Google to gain an unfair advantage against Google.

19       **939. Page 110, Appendix Table A6 (all numbers under column “Total”; all numbers**  
 20 **under column “No Price Change”; all numbers under column “Price Increase”; all numbers**  
 21 **under column “Price Decrease”).** This information contains non-public information regarding  
 22 Google’s confidential non-public internal strategic considerations related to creating value for and  
 23 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
 24 Disclosure of this information would adversely impact Google’s current competitive position by  
 25 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
 26 away from Google. This information reflects and is calculated from internal, non-public Google  
 27 financial data. Google spends significant resources compiling and maintaining this valuable data,

1 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
2 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
3 Google financial information. Further, this information reflects sensitive, highly confidential  
4 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
5 counterparties in negotiations with Google to gain an unfair advantage against Google.

6 940. Page 111, Appendix Table A7 (all numbers under column "Total"; all numbers  
7 under column "No Price Change"; all numbers under column "Price Increase"; all numbers  
8 under column "Price Decrease"). This information contains non-public information regarding  
9 Google's confidential non-public internal strategic considerations related to creating value for and  
10 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
11 Disclosure of this information would adversely impact Google's current competitive position by  
12 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
13 away from Google. This information reflects and is calculated from internal, non-public Google  
14 financial data. Google spends significant resources compiling and maintaining this valuable data,  
15 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
16 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
17 Google financial information. Further, this information reflects sensitive, highly confidential  
18 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
19 counterparties in negotiations with Google to gain an unfair advantage against Google.

20 941. Page 112, Appendix Table A8 (all numbers under column "Total"; all numbers  
21 under column "No Price Change"; all numbers under column "Price Increase"; all numbers  
22 under column "Price Decrease"). This information contains non-public information regarding  
23 Google's confidential non-public internal strategic considerations related to creating value for and  
24 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
25 Disclosure of this information would adversely impact Google's current competitive position by  
26 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
27 away from Google. This information reflects and is calculated from internal, non-public Google

1 financial data. Google spends significant resources compiling and maintaining this valuable data,  
2 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
3 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
4 Google financial information. Further, this information reflects sensitive, highly confidential  
5 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
6 counterparties in negotiations with Google to gain an unfair advantage against Google.

7 942. **Page 113, Appendix 3 (all numbers under column “(1) OLS”; all numbers under**  
8 **column “(2) IV”).** This information contains non-public information regarding Google’s confidential  
9 non-public internal strategic considerations related to creating value for and attracting developers to  
10 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
11 information would adversely impact Google’s current competitive position by enabling Google’s  
12 competitors to mimic its confidential strategies in an effort to attract developers away from Google.  
13 This information reflects and is calculated from internal, non-public Google financial data. Google  
14 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
15 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
16 Google competitive harm by giving competitors insight into confidential Google financial information.  
17 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
18 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
19 Google to gain an unfair advantage against Google.

20 943. **Page 114, Appendix 3 (all numbers under column “(1) OLS”; all numbers under**  
21 **column “(2) IV”).** This information contains non-public information regarding Google’s confidential  
22 non-public internal strategic considerations related to creating value for and attracting developers to  
23 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
24 information would adversely impact Google’s current competitive position by enabling Google’s  
25 competitors to mimic its confidential strategies in an effort to attract developers away from Google.  
26 This information reflects and is calculated from internal, non-public Google financial data. Google  
27 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
28



1 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
2 Google competitive harm by giving competitors insight into confidential Google financial information.  
3 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
4 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
5 Google to gain an unfair advantage against Google.

6 944. **Page 115, Appendix 4 (all numbers under column “(1)”;** all numbers under  
7 **column “(2)”**). This information contains non-public information regarding Google’s confidential  
8 non-public internal strategic considerations related to creating value for and attracting developers to  
9 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
10 information would adversely impact Google’s current competitive position by enabling Google’s  
11 competitors to mimic its confidential strategies in an effort to attract developers away from Google.  
12 This information reflects and is calculated from internal, non-public Google financial data. Google  
13 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
14 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
15 Google competitive harm by giving competitors insight into confidential Google financial information.  
16 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
17 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
18 Google to gain an unfair advantage against Google.

19 945. **Page 116, Paragraph 259 (between “developers) is only” and “percent, or just”;**  
20 **between “percent, or just” and “percent after netting”**). The disclosure of the non-party’s highly  
21 confidential information would significantly harm its business. For example, other app store  
22 competitors could leverage this information to reap an unearned competitive advantage. They could  
23 exploit this information—that they otherwise would not have access to—to inform their own business  
24 strategies. To prevent these competitive harms from coming to fruition, this non-party proactively  
25 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
26 individuals on an as-needed basis.

1           946.   **Page 117, Paragraph 259, Note 591 (between “that Samsung” and “See, e.g.,**  
2 **SEA\_EPICPRODUCTION\_002243 -2437.”)**. The disclosure of Samsung’s highly confidential  
3 information would significantly harm its business. For example, other app store competitors could  
4 leverage this information to reap an unearned competitive advantage. They could exploit this  
5 information—that they otherwise would not have access to—to inform their own business strategies.  
6 To prevent these competitive harms from coming to fruition, this non-party proactively maintains the  
7 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
8 needed basis.

9           947.   **Page 119, Appendix Table A9 (between “Steam revenue” and “power”).** The  
10 disclosure of Steam’s highly confidential information would significantly harm its business. For  
11 example, other app store competitors could leverage this information to reap an unearned competitive  
12 advantage. They could exploit this information—that they otherwise would not have access to—to  
13 inform their own business strategies. To prevent these competitive harms from coming to fruition,  
14 Steam proactively maintains the confidentiality of its strategic information, only disclosing it to a  
15 select group of individuals on an as-needed basis.

16           948.   **Page 118, Paragraph 264 (between “drops to” and “percent”; between “and to”**  
17 **and “percent”).** This information contains non-public information regarding Google’s confidential  
18 non-public internal strategic considerations related to creating value for and attracting developers to  
19 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
20 information would adversely impact Google’s current competitive position by enabling Google’s  
21 competitors to mimic its confidential strategies in an effort to attract developers away from Google.  
22 This information reflects and is calculated from internal, non-public Google financial data. Google  
23 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
24 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
25 Google competitive harm by giving competitors insight into confidential Google financial information.  
26 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
27  
28

1 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
2 Google to gain an unfair advantage against Google.

3 **Google's Motion to Exclude Opinions Offered by Hal Singer - Exhibit 7 [Dkt. No. 487-8]**  
4 **(Exhibit E6)**

5 949. **Exhibit 7, Page 125, Line 5 (between "that figure is" and end of sentence).** This  
6 information reflects and is calculated from internal, non-public Google financial data. Google spends  
7 significant resources compiling and maintaining this valuable data, which is non-public, and if  
8 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
9 Google competitive harm by giving competitors insight into confidential Google financial information.  
10 For example, if revealed, this information could be referenced by potential counterparties in  
11 negotiations with Google to gain an unfair advantage against Google.

12 950. **Exhibit 7, Page 125, Line 8 (between "will drop to" and "for in-app purchases").**  
13 This information reflects and is calculated from internal, non-public Google financial data. It includes  
14 information relating to the service fee rate that Google would supposedly charge in a but-for world  
15 according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
16 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
17 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
18 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
19 Google financial information. For example, if disclosed, this data point could be used by potential  
20 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

21 951. **Exhibit 7, Page 125, Line 13 (between "purchases is" and end of sentence).** This  
22 information reflects and is calculated from internal, non-public Google financial data. It includes  
23 information relating to the service fee rate that Google would supposedly charge in a but-for world  
24 according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
25 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
26 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
27 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
28

1 Google financial information. For example, if disclosed, this data point could be used by potential  
2 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

3 952. **Exhibit 7, Page 125, Line 18 (between “purchases would be” and “correct”).** This  
4 information reflects and is calculated from internal, non-public Google financial data. It includes  
5 information relating to the service fee rate that Google would supposedly charge in a but-for world  
6 according to Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
7 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
8 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
9 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
10 Google financial information. For example, if disclosed, this data point could be used by potential  
11 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

12 953. **Exhibit 7, Page 125, Lines 19-20 (between “you’re doing the” and “minus”;**  
13 **between “minus” and end of sentence).** This information reflects and is calculated from internal,  
14 non-public Google financial data. It includes information relating to the service fee rate that Google  
15 would supposedly charge in a but-for world according to Plaintiffs' expert's calculations, which are  
16 derived from Google's highly confidential transactional data. Google spends significant resources  
17 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
18 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
19 by giving competitors insight into confidential Google financial information. For example, if disclosed,  
20 this data point could be used by potential counterparties negotiating with Google as a benchmark,  
21 weakening Google's competitive position.

22 954. **Exhibit 7, Page 126, Line 10 (between “rate of” and “percent”).** This information  
23 reflects and is calculated from internal, non-public Google financial data. It includes information  
24 relating Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
25 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
26 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
27 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
28

1 Google financial information. For example, if disclosed, this data point could be used by potential  
2 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

3 955. **Exhibit 7, Page 126, Line 16 (between “transaction of” and “right”).** This  
4 information reflects and is calculated from internal, non-public Google financial data. It includes  
5 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
6 confidential transactional data. Google spends significant resources compiling and maintaining this  
7 valuable data, which is non-public, and if revealed to competitors and potential business  
8 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
9 competitors insight into confidential Google financial information. For example, if disclosed, this data  
10 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
11 Google's competitive position.

12 956. **Exhibit 7, Page 126, Line 19 (between “that’s just” and “percent”).** This  
13 information reflects and is calculated from internal, non-public Google financial data. It includes  
14 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
15 confidential transactional data. Google spends significant resources compiling and maintaining this  
16 valuable data, which is non-public, and if revealed to competitors and potential business  
17 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
18 competitors insight into confidential Google financial information. For example, if disclosed, this data  
19 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
20 Google's competitive position.

21 957. **Exhibit 7, Page 126, Line 22 (between “service fee of” and “right”).** This  
22 information reflects and is calculated from internal, non-public Google financial data. It includes  
23 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
24 confidential transactional data. Google spends significant resources compiling and maintaining this  
25 valuable data, which is non-public, and if revealed to competitors and potential business  
26 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
27 competitors insight into confidential Google financial information. For example, if disclosed, this data  
28

1 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
2 Google's competitive position.

3 958. **Exhibit 7, Page 127, Line 5 (between “Not all of it” and “percent of it”).** This  
4 information reflects and is calculated from internal, non-public Google financial data. It includes  
5 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
6 confidential transactional data. Google spends significant resources compiling and maintaining this  
7 valuable data, which is non-public, and if revealed to competitors and potential business  
8 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
9 competitors insight into confidential Google financial information. For example, if disclosed, this data  
10 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
11 Google's competitive position.

12 959. **Exhibit 7, Page 127, Line 10 (between “rate of” and “percent”).** This information  
13 reflects and is calculated from internal, non-public Google financial data. It includes information  
14 relating to Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
15 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
16 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
17 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
18 Google financial information. For example, if disclosed, this data point could be used by potential  
19 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

20 960. **Exhibit 7, Page 164, Lines 24-25 (between “service fee” and “I--I could have**  
21 **employed”).** This text contains non-public and confidential information regarding the extent to which  
22 Google varied its service fee. This information has never been disclosed publicly and the Google Play  
23 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
24 competitive decision-making and business strategies employed by Google's app store competitors, for  
25 example by influencing how those app stores market themselves to developers and how they  
26 distinguish themselves from Google Play in the eyes of developers. In addition, disclosure of this non-  
27 public information is likely to result in competitive harm to Google, as it reveals strategic decision-

1 making which, for example, could give a competitor or potential business partner unfair leverage in  
2 competing against or negotiating with Google.

3 **961. Exhibit 7, Page 186, Line 2 (between “deduction is” and “for in-app purchases”).**

4 This information reflects and is calculated from internal, non-public Google financial data. It includes  
5 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
6 confidential transactional data. Google spends significant resources compiling and maintaining this  
7 valuable data, which is non-public, and if revealed to competitors and potential business  
8 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
9 competitors insight into confidential Google financial information. For example, if disclosed, this data  
10 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
11 Google's competitive position.

12 **962. Exhibit 7, Page 190, Line 10 (between “going to be” and “and that should be”).**

13 This information reflects and is calculated from internal, non-public Google financial data. It includes  
14 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
15 confidential transactional data. Google spends significant resources compiling and maintaining this  
16 valuable data, which is non-public, and if revealed to competitors and potential business  
17 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
18 competitors insight into confidential Google financial information. For example, if disclosed, this data  
19 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
20 Google's competitive position.

21 **963. Exhibit 7, Page 190, Lines 24-25 (between “will drop by” and end of sentence).**

22 This information reflects and is calculated from internal, non-public Google financial data. It includes  
23 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
24 confidential transactional data. Google spends significant resources compiling and maintaining this  
25 valuable data, which is non-public, and if revealed to competitors and potential business  
26 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
27 competitors insight into confidential Google financial information. For example, if disclosed, this data  
28



1 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
2 Google's competitive position.

3       **964. Exhibit 7, Page 191, Line 1 (between “the difference of” and “sounds right”).** This  
4 information reflects and is calculated from internal, non-public Google financial data. It includes  
5 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
6 confidential transactional data. Google spends significant resources compiling and maintaining this  
7 valuable data, which is non-public, and if revealed to competitors and potential business  
8 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
9 competitors insight into confidential Google financial information. For example, if disclosed, this data  
10 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
11 Google's competitive position.

12       **965. Exhibit 7, Page 191, Line 4 (between “equivalent of, like” and end of sentence).**  
13 This information reflects and is calculated from internal, non-public Google financial data. It includes  
14 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
15 confidential transactional data. Google spends significant resources compiling and maintaining this  
16 valuable data, which is non-public, and if revealed to competitors and potential business  
17 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
18 competitors insight into confidential Google financial information. For example, if disclosed, this data  
19 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
20 Google's competitive position.

21       **966. Exhibit 7, Page 191, Line 7 (between “marginal cost is” and “right”).** This  
22 information reflects and is calculated from internal, non-public Google financial data. It includes  
23 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
24 confidential transactional data. Google spends significant resources compiling and maintaining this  
25 valuable data, which is non-public, and if revealed to competitors and potential business  
26 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
27 competitors insight into confidential Google financial information. For example, if disclosed, this data  
28

1 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
2 Google's competitive position.

3 967. **Exhibit 7, Page 191, Line 12 (between “does that” and “reflect”).** This information  
4 reflects and is calculated from internal, non-public Google financial data. It includes information  
5 relating to Plaintiffs' expert's calculations, which are derived from Google's highly confidential  
6 transactional data. Google spends significant resources compiling and maintaining this valuable data,  
7 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
8 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
9 Google financial information. For example, if disclosed, this data point could be used by potential  
10 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

11 968. **Exhibit 7, Page 192, Line 10 (between “here is at” and “Are we going”).** This  
12 information reflects and is calculated from internal, non-public Google financial data. Google spends  
13 significant resources compiling and maintaining this valuable data, which is non-public, and if  
14 revealed to competitors and potential business counterparties, could be used to disadvantage and cause  
15 Google competitive harm by giving competitors insight into confidential Google financial information.  
16 For example, if disclosed, this data point could be used by potential counterparties negotiating with  
17 Google as a benchmark, weakening Google's competitive position.

18 969. **Exhibit 7, Page 192, Line 23 (between “would be” and “according to your  
19 formula”).** This information reflects and is calculated from internal, non-public Google financial data.  
20 It includes information relating to Plaintiffs' expert's calculations, which are derived from Google's  
21 highly confidential transactional data. Google spends significant resources compiling and maintaining  
22 this valuable data, which is non-public, and if revealed to competitors and potential business  
23 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
24 competitors insight into confidential Google financial information. For example, if disclosed, this data  
25 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
26 Google's competitive position.

1           **970. Exhibit 7, Page 192, Line 25 (between “not” and “that you have in”).** This  
2 information reflects and is calculated from internal, non-public Google financial data. It includes  
3 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
4 confidential transactional data. Google spends significant resources compiling and maintaining this  
5 valuable data, which is non-public, and if revealed to competitors and potential business  
6 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
7 competitors insight into confidential Google financial information. For example, if disclosed, this data  
8 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
9 Google's competitive position.

10           **971. Exhibit 7, Page 195, Line 10 (between “cost would be” and “cents”).** This  
11 information reflects and is calculated from internal, non-public Google financial data. It includes  
12 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
13 confidential transactional data. Google spends significant resources compiling and maintaining this  
14 valuable data, which is non-public, and if revealed to competitors and potential business  
15 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
16 competitors insight into confidential Google financial information. For example, if disclosed, this data  
17 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
18 Google's competitive position.

19           **972. Exhibit 7, Page 195, Line 11 (between “instead of the” and end of sentence).** This  
20 information reflects and is calculated from internal, non-public Google financial data. It includes  
21 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
22 confidential transactional data. Google spends significant resources compiling and maintaining this  
23 valuable data, which is non-public, and if revealed to competitors and potential business  
24 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
25 competitors insight into confidential Google financial information. For example, if disclosed, this data  
26 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
27 Google's competitive position.

1           **973. Exhibit 7, Page 195, Line 16 (between “would suggest” and “percentage”).** This  
2 information reflects and is calculated from internal, non-public Google financial data. It includes  
3 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
4 confidential transactional data. Google spends significant resources compiling and maintaining this  
5 valuable data, which is non-public, and if revealed to competitors and potential business  
6 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
7 competitors insight into confidential Google financial information. For example, if disclosed, this data  
8 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
9 Google's competitive position.

10           **974. Exhibit 7, Page 195, Lines 18-19 (between “it would be” and end of sentence).** This  
11 information reflects and is calculated from internal, non-public Google financial data. It includes  
12 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
13 confidential transactional data. Google spends significant resources compiling and maintaining this  
14 valuable data, which is non-public, and if revealed to competitors and potential business  
15 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
16 competitors insight into confidential Google financial information. For example, if disclosed, this data  
17 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
18 Google's competitive position.

19           **975. Exhibit 7, Page 196, Line 1 (between “less than the” and “that you have”).** This  
20 information reflects and is calculated from internal, non-public Google financial data. It includes  
21 information relating to Plaintiffs' expert's calculations, which are derived from Google's highly  
22 confidential transactional data. Google spends significant resources compiling and maintaining this  
23 valuable data, which is non-public, and if revealed to competitors and potential business  
24 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
25 competitors insight into confidential Google financial information. For example, if disclosed, this data  
26 point could be used by potential counterparties negotiating with Google as a benchmark, weakening  
27 Google's competitive position.

1           976.   **Exhibit 7, Page 288, Line 3 (between “at” and “percent or whatever”; between**  
2 **“percent or whatever” and “offering that”).** This information contains non-public and confidential  
3 data regarding the Play Points program on Google Play. This information has never been disclosed  
4 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
5 information could influence the competitive decision-making and business strategies employed by  
6 Google’s app store competitors, for example by influencing how those app stores market themselves to  
7 developers and how they distinguish themselves from Google Play in the eyes of developers. In  
8 addition, revealing such information could influence the negotiating strategies and tactics employed by  
9 app developers and other current and prospective counterparties with which Google does or may  
10 transact business.

11           977.   **Exhibit 7, Page 288, Lines 6-7 (between “here’s a” and “go”).** This information  
12 contains non-public and confidential data regarding the Play Points program on Google Play. This  
13 information has never been disclosed publicly and the Google Play product team treats it as strictly  
14 confidential. If publicly revealed, this information could influence the competitive decision-making  
15 and business strategies employed by Google’s app store competitors, for example by influencing how  
16 those app stores market themselves to developers and how they distinguish themselves from Google  
17 Play in the eyes of developers. In addition, revealing such information could influence the negotiating  
18 strategies and tactics employed by app developers and other current and prospective counterparties  
19 with which Google does or may transact business.

20           978.   **Exhibit 7, Page 288, Line 10 (between “set at” and “percent”).** This information  
21 contains non-public and confidential data regarding the Play Points program on Google Play. This  
22 information has never been disclosed publicly and the Google Play product team treats it as strictly  
23 confidential. If publicly revealed, this information could influence the competitive decision-making  
24 and business strategies employed by Google’s app store competitors, for example by influencing how  
25 those app stores market themselves to developers and how they distinguish themselves from Google  
26 Play in the eyes of developers. In addition, revealing such information could influence the negotiating  
27  
28

1 strategies and tactics employed by app developers and other current and prospective counterparties  
2 with which Google does or may transact business.

3 979. **Exhibit 7, Page 288, Lines 12-20 (between “it’s correct that” and “I asked”).** This  
4 information contains non-public and confidential data regarding the Play Points program on Google  
5 Play. This information has never been disclosed publicly and the Google Play product team treats it as  
6 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
7 making and business strategies employed by Google’s app store competitors, for example by  
8 influencing how those app stores market themselves to developers and how they distinguish  
9 themselves from Google Play in the eyes of developers. In addition, revealing such information could  
10 influence the negotiating strategies and tactics employed by app developers and other current and  
11 prospective counterparties with which Google does or may transact business.

12 980. **Exhibit 7, Page 288, Lines 21-25 (between “question why bother” to end of page).**  
13 This information contains non-public and confidential data regarding the Play Points program on  
14 Google Play. This information has never been disclosed publicly and the Google Play product team  
15 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
16 decision-making and business strategies employed by Google’s app store competitors, for example by  
17 influencing how those app stores market themselves to developers and how they distinguish  
18 themselves from Google Play in the eyes of developers. In addition, revealing such information could  
19 influence the negotiating strategies and tactics employed by app developers and other current and  
20 prospective counterparties with which Google does or may transact business.

21 981. **Exhibit 7, Page 289, Lines 1 (entire line).** This text, when read in combination with  
22 the preceding Page 288 at Lines 21-25, reveals non-public and confidential information regarding the  
23 Play Points program on Google Play. This information has never been disclosed publicly and the  
24 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
25 influence the competitive decision-making and business strategies employed by Google’s app store  
26 competitors, for example by influencing how those app stores market themselves to developers and  
27 how they distinguish themselves from Google Play in the eyes of developers. In addition, revealing

1 such information could influence the negotiating strategies and tactics employed by app developers  
2 and other current and prospective counterparties with which Google does or may transact business.

3 982. **Exhibit 7, Page 289, Line 3 (between “was at” and “percent”).** This information  
4 contains non-public and confidential data regarding the Play Points program on Google Play. This  
5 information has never been disclosed publicly and the Google Play product team treats it as strictly  
6 confidential. If publicly revealed, this information could influence the competitive decision-making  
7 and business strategies employed by Google’s app store competitors, for example by influencing how  
8 those app stores market themselves to developers and how they distinguish themselves from Google  
9 Play in the eyes of developers. In addition, revealing such information could influence the negotiating  
10 strategies and tactics employed by app developers and other current and prospective counterparties  
11 with which Google does or may transact business.

12 983. **Exhibit 7, Page 289, Line 4 (between “whatever” and “amount”).** This text reveals  
13 non-public and confidential information regarding the Play Points program on Google Play. It includes  
14 Plaintiff’s expert’s characterizations of certain aspects of the program, which are based on confidential  
15 Google data regarding the program. This information has never been disclosed publicly and the  
16 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
17 influence the competitive decision-making and business strategies employed by Google’s app store  
18 competitors, for example by influencing how those app stores market themselves to developers and  
19 how they distinguish themselves from Google Play in the eyes of developers. In addition, revealing  
20 such information could influence the negotiating strategies and tactics employed by app developers  
21 and other current and prospective counterparties with which Google does or may transact business.

22 984. **Exhibit 7, Page 289, Line 5 (between “you’d get” and “in”).** This text contains non-  
23 public and confidential information regarding the Play Points program on Google Play. It includes  
24 Plaintiff’s expert’s characterizations of certain aspects of the program, which are based on confidential  
25 Google data regarding the program. This information has never been disclosed publicly and the Google  
26 Play product team treats it as strictly confidential. If publicly revealed, this information could influence  
27 the competitive decision-making and business strategies employed by Google’s app store competitors,  
28



1 for example by influencing how those app stores market themselves to developers and how they  
2 distinguish themselves from Google Play in the eyes of developers. In addition, revealing such  
3 information could influence the negotiating strategies and tactics employed by app developers and  
4 other current and prospective counterparties with which Google does or may transact business.

5 **985. Exhibit 7, Page 289, Line 10 (between “instead of a” and “it was”).** This  
6 information contains non-public and confidential data regarding the Play Points program on Google  
7 Play. This information has never been disclosed publicly and the Google Play product team treats it as  
8 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
9 making and business strategies employed by Google’s app store competitors, for example by  
10 influencing how those app stores market themselves to developers and how they distinguish  
11 themselves from Google Play in the eyes of developers. In addition, revealing such information could  
12 influence the negotiating strategies and tactics employed by app developers and other current and  
13 prospective counterparties with which Google does or may transact business.

14 **986. Exhibit 7, Page 289, Line 11 (between “it was” and “right, and you asked me”).**  
15 This text contains statements that are based on or derived from non-public and confidential data  
16 regarding the Play Points program on Google Play. If revealed, this text could give competitors insight  
17 into Google’s sensitive business information. This information has never been disclosed publicly and  
18 the Google Play product team treats it as strictly confidential. Disclosure of this information could  
19 influence the competitive decision-making and business strategies employed by Google’s app store  
20 competitors, for example by influencing how those competitors structure their own points or rewards  
21 programs.

22 **987. Exhibit 7, Page 289, Lines 15 (between “literally” and “purchase”).** This text  
23 contains non-public and confidential information regarding the Play Points program on Google Play. It  
24 includes Plaintiff’s expert’s characterizations of certain aspects of the program, which are based on  
25 confidential Google data regarding the program. This information has never been disclosed publicly  
26 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
27 could influence the competitive decision-making and business strategies employed by Google’s app  
28

1 store competitors, for example by influencing how those app stores market themselves to developers  
2 and how they distinguish themselves from Google Play in the eyes of developers. In addition,  
3 revealing such information could influence the negotiating strategies and tactics employed by app  
4 developers and other current and prospective counterparties with which Google does or may transact  
5 business.

6       **988. Exhibit 7, Page 289, Lines 18-21 (between “that the” and “I can accept”).** This text  
7 contains non-public and confidential information regarding the Play Points program on Google Play. It  
8 includes Plaintiff’s expert’s characterizations of certain aspects of the program, which are based on  
9 confidential Google data regarding the program. This information has never been disclosed publicly  
10 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
11 could influence the competitive decision-making and business strategies employed by Google’s app  
12 store competitors, for example by influencing how those app stores market themselves to developers  
13 and how they distinguish themselves from Google Play in the eyes of developers. In addition,  
14 revealing such information could influence the negotiating strategies and tactics employed by app  
15 developers and other current and prospective counterparties with which Google does or may transact  
16 business.

17       **989. Exhibit 7, Page 295, Line 2 (between “conceive that” and “that it just”).** This text  
18 contains non-public and confidential information regarding the Play Points program on Google Play. It  
19 includes Plaintiff’s expert’s characterizations of certain aspects of the program, which are based on  
20 confidential Google data regarding the program. This information has never been disclosed publicly  
21 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
22 could influence the competitive decision-making and business strategies employed by Google’s app  
23 store competitors, for example by influencing how those app stores market themselves to developers  
24 and how they distinguish themselves from Google Play in the eyes of developers. In addition,  
25 revealing such information could influence the negotiating strategies and tactics employed by app  
26 developers and other current and prospective counterparties with which Google does or may transact  
27 business.

1           990.   **Exhibit 7, Page 295, Line 12 (between “So that” and “that comes out”).** This text  
2 contains non-public and confidential information relating to the subsidy that would be offered to  
3 consumers in a but-for world according to Plaintiffs' expert's calculations, which are based on and  
4 derived from Google's highly confidential transactional data. If disclosed, this data point could be used  
5 by potential counterparties negotiating with Google as a benchmark, weakening Google's competitive  
6 position.

7           991.   **Exhibit 7, Page 295, Line 16 (between “to that” and “or some people”).** This text  
8 contains non-public and confidential information relating to the subsidy that would be offered to  
9 consumers in a but-for world according to Plaintiffs' expert's calculations, which are based on and  
10 derived from Google's highly confidential transactional data. If disclosed, this data point could be used  
11 by potential counterparties negotiating with Google as a benchmark, weakening Google's competitive  
12 position.

13           992.   **Exhibit 7, Page 296, Line 14 (between “telling us” and “the way to”).** This text  
14 contains non-public and confidential information relating to the subsidy that would be offered to  
15 consumers in a but-for world according to Plaintiffs' expert's calculations, which are based on and  
16 derived from Google's highly confidential transactional data. If disclosed, this data point could be used  
17 by potential counterparties negotiating with Google as a benchmark, weakening Google's competitive  
18 position.

19           993.   **Exhibit 7, Page 296, Line 19 (between “would be” and end of sentence).** This text  
20 contains non-public and confidential information relating to the subsidy offered to consumers in a but-  
21 for world according to Plaintiffs' expert's calculations, which are based on and derived from Google's  
22 highly confidential transactional data. If disclosed, this data point could be used by potential  
23 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

24           994.   **Exhibit 7, Page 297, Lines 1-2 (between “think that at” and “the economic**  
25 **intuition”).** This text contains non-public and confidential information relating to the subsidy offered  
26 to consumers in a but-for world according to Plaintiffs' expert's calculations, which are based on and  
27 derived from Google's highly confidential transactional data. If disclosed, this data point could be used  
28

1 by potential counterparties negotiating with Google as a benchmark, weakening Google's competitive  
2 position.

3 995. **Exhibit 7, Page 297, Lines 16-17 (between “to rise to” and “then it”).** This text  
4 contains non-public and confidential information relating to the subsidy offered to consumers in a but-  
5 for world according to Plaintiffs' expert's calculations, which are based on and derived from Google's  
6 highly confidential transactional data. If disclosed, this data point could be used by potential  
7 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

8 996. **Exhibit 7, Page 298, Line 9 (between “trying to give me” and “but, no”).** This text  
9 contains non-public and confidential information relating to the subsidy offered to consumers in a but-  
10 for world according to Plaintiffs' expert's calculations, which are based on and derived from Google's  
11 highly confidential transactional data. If disclosed, this data point could be used by potential  
12 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

13 997. **Exhibit 7, Page 298, Line 10 (between “want the” and “I want to spend”).** This text  
14 contains non-public and confidential information relating to the subsidy offered to consumers in a but-  
15 for world according to Plaintiffs' expert's calculations, which are based on and derived from Google's  
16 highly confidential transactional data. If disclosed, this data point could be used by potential  
17 counterparties negotiating with Google as a benchmark, weakening Google's competitive position.

18 998. **Exhibit 7, Page 298, Lines 18 (between “get” and “back on”).** This text contains  
19 non-public and confidential information regarding the Play Points program on Google Play. It includes  
20 Plaintiff's expert's characterizations of certain aspects of the program, which are based on confidential  
21 Google data regarding the program. This information has never been disclosed publicly and the Google  
22 Play product team treats it as strictly confidential. If publicly revealed, this information could influence  
23 the competitive decision-making and business strategies employed by Google's app store competitors,  
24 for example by influencing how those app stores market themselves to developers and how they  
25 distinguish themselves from Google Play in the eyes of developers. In addition, revealing such  
26 information could influence how Google's competitors structure and design their own points or  
27 rewards programs.



1 disadvantage Google, for example, by giving competitors insight into consumer spend patterns or  
2 imply spend concentration on Google Play.

3 **1003. Page 5, Line 12-14 (between “less revenue (averaging” and “per year) than those”;**  
4 **between “control group (averaging” and “per year”).** This text contains the annual consumer  
5 spend generated by developers subject to reduced service fees on Google Play analyzed by Dr.  
6 Leonard, which is derived from Google's highly confidential transactional data. If publicly revealed,  
7 this information could influence the competitive decision-making and business strategies employed by  
8 Google’s app store competitors, for example by influencing how those app stores market themselves to  
9 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

10 **1004. Page 9-10, Line 23-2 (between “price floor; approximately” and “of developers**  
11 **reduced”).** This text reflects the percentage of developers that reduced prices below 99 cents when  
12 Google Play removed its 99 cent price floor. This figure is derived from Google’s highly confidential  
13 transactional data. Disclosure of this information would adversely impact Google’s current competitive  
14 position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract  
15 developers away from Google.

16 **1005. Page 10, Line 15-17 (between “resulted in only” and “of transactions not”).** This  
17 text reflects the results of analyses performed by Dr. Singer relating to “focal point” pricing on Google  
18 Play in the but-for world. If publicly revealed, this information could influence the competitive  
19 decision-making and business strategies employed by Google’s app store competitors, for example by  
20 influencing how those app stores market themselves to U.S. developers and how they distinguish  
21 themselves from Google Play in the eyes of U.S. developers.

22 **1006. Page 13, Line 16-18 (between “About” and “of consumers have already”; between**  
23 **“Play Points subsidy “is” and “right now”).** This text describes confidential and non-public details  
24 about Play Points and its usage. If those details were revealed to competitors and potential business  
25 counterparties, they could use that information to disadvantage Google.

26 **1007. Page 13, Line 24 (between “spend coverage of” and “percent”; between “Play**  
27 **Points” and “within just one”).** This text describes confidential and non-public details about Play  
28

Points and its usage in a specific geographic market. If those details were revealed to competitors and potential business counterparties, they could use that information to disadvantage Google. For example, competitors could use this information to target developers and consumers in this market, to the detriment of Google.

**Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Hal Singer - Exhibit 1**

**[Dkt. No. 508-2]**

**(Exhibit E2)**

**1008. This Exhibit is duplicative of Exhibit 1 to Google's Motion to Exclude Opinions Offered by Hal Singer (Dkt. No. 487-2) and Google's sealing positions are reflected in Paragraphs 420 to 601 above.**

**Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Hal Singer - Exhibit 3**

**[Dkt. No. 508-4]**

**(Exhibit E3)**

**1009. This Exhibit is duplicative of Exhibit 2 to Google's Motion to Exclude Opinions Offered by Hal Singer (Dkt. No. 487-3) and Google's sealing positions are reflected in Paragraphs 601 to 815 above.**

**Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Hal Singer -**

**Exhibit 7 [Dkt. No. 508-8]**

**(Exhibit F2)**

**1010. Exhibit 7, Page 167, Line 3 (between "we're talking about" and "savings").** This text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs' expert claims would be offered to consumers through the Play Points program in the but-for world. This information is non-public. If revealed publicly, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers. For example, a competitor to Google Play would be able to use this information to meet or beat the subsidy offered by Google Play through its loyalty program, and use that information to draw customers away from Google Play.



1           **1011. Exhibit 7, Page 167, Line 18 (between “of” and “you see many”).** This text contains  
2 non-public and confidential data regarding the percentage of subsidy offered to consumers through the  
3 Play Points program. This information is non-public and derived from Google’s highly confidential  
4 transactional data. If revealed publicly, an app store competitor could make decisions about its own  
5 reward programs and the value of subsidies to offer consumers in order to better compete against  
6 Google Play and target those same consumers. For example, a competitor to Google Play would be  
7 able to use this information to meet or beat the subsidy offered by Google Play through its loyalty  
8 program, and use that information to draw customers away from Google Play.

9           **1012. Exhibit 7, Page 167, Line 21-22 (between “in the order of” and “if we –”).** This text  
10 contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert claims  
11 would be offered to consumers through the Play Points program in the but-for world. This information  
12 is non-public. If revealed publicly, an app store competitor could make decisions about its own reward  
13 programs and the value of subsidies to offer consumers in order to better compete against Google Play  
14 and target those same consumers. For example, a competitor to Google Play would be able to use this  
15 information to meet or beat the subsidy offered by Google Play through its loyalty program, and use  
16 that information to draw customers away from Google Play.

17           **1013. Exhibit 7, Page 168, Line 11-12 (between “subsidy from, say,” and “right, that**  
18 **is”).** This text contains non-public and confidential data regarding both the percentage of subsidy that  
19 is offered, and that Plaintiffs’ expert claims would be offered, to consumers through the Play Points  
20 program in the actual world and but-for world. This information is non-public. If revealed publicly, an  
21 app store competitor could make decisions about its own reward programs and the value of subsidies to  
22 offer consumers in order to better compete against Google Play and target those same consumers. For  
23 example, a competitor to Google Play would be able to use this information to meet or beat the subsidy  
24 offered by Google Play through its loyalty program, and use that information to draw customers away  
25 from Google Play.

26           **1014. Exhibit 7, Page 168, Line 15 (between “who are getting” and “off and you”).** This  
27 text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert  
28

1 claims would be offered to consumers through the Play Points program in the but-for world. This  
2 information is non-public and derived from Google's highly confidential transactional data. If revealed  
3 publicly, an app store competitor could make decisions about its own reward programs and the value  
4 of subsidies to offer consumers in order to better compete against Google Play and target those same  
5 consumers. For example, a competitor to Google Play would be able to use this information to meet or  
6 beat the subsidy offered by Google Play through its loyalty program, and use that information to draw  
7 customers away from Google Play.

8 **1015. Exhibit 7, Page 169, Line 23 (between "paltry" and "you know, since").** This text  
9 contains non-public and confidential data regarding the percentage of subsidy offered to consumers  
10 through the Play Points program. This information is non-public and derived from Google's highly  
11 confidential transactional data. If revealed publicly, an app store competitor could make decisions  
12 about its own reward programs and the value of subsidies to offer consumers in order to better compete  
13 against Google Play and target those same consumers. For example, a competitor to Google Play  
14 would be able to use this information to meet or beat the subsidy offered by Google Play through its  
15 loyalty program, and use that information to draw customers away from Google Play.

16 **1016. Exhibit 7, Page 172, Line 17-18 (between "you get into" and "I think that it").** This  
17 text contains non-public and confidential data regarding the percentage of subsidy offered to  
18 consumers through the Play Points program. This information is non-public and derived from Google's  
19 highly confidential transactional data. If revealed publicly, an app store competitor could make  
20 decisions about its own reward programs and the value of subsidies to offer consumers in order to  
21 better compete against Google Play and target those same consumers. For example, a competitor to  
22 Google Play would be able to use this information to meet or beat the subsidy offered by Google Play  
23 through its loyalty program, and use that information to draw customers away from Google Play.

24 **1017. Exhibit 7, Page 180, Line 3-4 (between "damages at the" and "that you have").**  
25 This information reflects and is calculated from internal, non-public Google financial data. Were this  
26 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
27 insight into confidential Google financial information.

1           **1018. Exhibit 7, Page 180, Line 5-6 (between “model or the” and “that you have”).** This  
2 information reflects and is calculated from internal, non-public Google financial data. Were this  
3 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
4 insight into confidential Google financial information.

5           **1019. Exhibit 7, Page 180, Line 12 (between “toggle between the” and “of”).** This text  
6 contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert claims  
7 would be offered to consumers through the Play Points program in the but-for world. This information  
8 is non-public. If revealed publicly, an app store competitor could make decisions about its own reward  
9 programs and the value of subsidies to offer consumers in order to better compete against Google Play  
10 and target those same consumers. For example, a competitor to Google Play would be able to use this  
11 information to meet or beat the subsidy offered by Google Play through its loyalty program, and use  
12 that information to draw customers away from Google Play.

13           **1020. Exhibit 7, Page 180, Line 13 (between “Play Points and” and “which is about”).**  
14 This text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’  
15 expert claims would be offered to consumers through the Play Points program in the but-for world.  
16 This information is non-public. If revealed publicly, an app store competitor could make decisions  
17 about its own reward programs and the value of subsidies to offer consumers in order to better compete  
18 against Google Play and target those same consumers. For example, a competitor to Google Play  
19 would be able to use this information to meet or beat the subsidy offered by Google Play through its  
20 loyalty program, and use that information to draw customers away from Google Play.

21           **1021. Exhibit 7, Page 180, Line 13-14 (between “which is about” and “should we”).** This  
22 text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert  
23 claims would be offered to consumers through the Play Points program in the but-for world. This  
24 information is non-public. If revealed publicly, an app store competitor could make decisions about its  
25 own reward programs and the value of subsidies to offer consumers in order to better compete against  
26 Google Play and target those same consumers. For example, a competitor to Google Play would be

able to use this information to meet or beat the subsidy offered by Google Play through its loyalty program, and use that information to draw customers away from Google Play.

**Plaintiffs’ Opposition to Google’s Motion to Exclude Opinions Offered by Hal Singer -**

**Exhibit 13 [Dkt. No. 508-14]**

**(Exhibit F3)**

1022. **Exhibit 13, Page -874.R (all figures in columns named “Top 10 gaps” and “Dev Country” and “Annual Gap”; text before “-” in each row following “manually map their markets”).** The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

1023. **Exhibit 13, Page -876.R (between “on iOS and” and “is 18% of total”; all figures in columns named “Top 10 gaps” and “Dev Country” and “Annual Gap” except rows named “Match.com” and “PlentyOfFish”).** The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

1024. **Exhibit 13, Page -877.R (all figures in columns named “Top 10 gaps” and “Dev Country” and “Play Spend” and “Annual Gap” except row named “Tinder”).** The disclosure of developers' highly confidential information would significantly harm developers' business. For example, developers' competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition,

1 developers proactively maintain the confidentiality of its strategic information, only disclosing it to a  
2 select group of individuals on an as-needed basis.

3 **1025. Exhibit 13, Page -884.R (between “Dominated by” and “Less than 20% buy”; all**  
4 **titles below columns in figure).** The disclosure of developers' highly confidential information would  
5 significantly harm developers' business. For example, developers' competitors could leverage this  
6 information to reap an unearned competitive advantage. They could exploit this information—that they  
7 otherwise would not have access to—to inform their own business strategies. To prevent these  
8 competitive harms from coming to fruition, developers proactively maintain the confidentiality of its  
9 strategic information, only disclosing it to a select group of individuals on an as-needed basis.

10 **Plaintiffs’ Opposition to Google’s Motion to Exclude Opinions Offered by Hal Singer -**  
11 **Exhibit 14 [Dkt. No. 508-15]**  
12 **(Exhibit F4)**

13 **1026. Exhibit 14, Page 293, Line 24 (between “and purposes, is” and “right now.”).** This  
14 text reflects and is calculated from internal, non-public Google financial data and data relating to  
15 Google’s Play Points reward program, including regarding the value of subsidy provided. Google  
16 spends significant resources compiling and maintaining this valuable data, which is non-public, and if  
17 revealed to competitors and potential business counterparties, an app store competitor could make  
18 decisions about its own reward programs and the value of subsidies to offer consumers in order to  
19 better compete against Google Play and target those same consumers.

20 **1027. Exhibit 14, Page 294, Line 5 (between “to around” and “and all of”).** This text  
21 reflects and is calculated from internal, non-public Google financial data and data relating to Google’s  
22 Play Points reward program, including regarding the value of subsidy provided. Google spends  
23 significant resources compiling and maintaining this valuable data, which is non-public, and if  
24 revealed to competitors and potential business counterparties, an app store competitor could make  
25 decisions about its own reward programs and the value of subsidies to offer consumers in order to  
26 better compete against Google Play and target those same consumers.

1           **1028. Exhibit 14, Page 294, Line 7-8 (between “know” and “is not real”; between “is not**  
 2 **real.” and “actually might make”).** This text reflects and is calculated from internal, non-public  
 3 Google financial data and data relating to Google’s Play Points reward program, including regarding  
 4 the value of subsidy provided. Google spends significant resources compiling and maintaining this  
 5 valuable data, which is non-public, and if revealed to competitors and potential business  
 6 counterparties, an app store competitor could make decisions about its own reward programs and the  
 7 value of subsidies to offer consumers in order to better compete against Google Play and target those  
 8 same consumers.

9           **1029. Exhibit 14, Page 294, Line 22 (between “than” and “In fact, Williams”).** This text  
 10 reflects and is calculated from internal, non-public Google financial data and data relating to Google’s  
 11 Play Points reward program, including regarding the value of subsidy provided. Google spends  
 12 significant resources compiling and maintaining this valuable data, which is non-public, and if  
 13 revealed to competitors and potential business counterparties, an app store competitor could make  
 14 decisions about its own reward programs and the value of subsidies to offer consumers in order to  
 15 better compete against Google Play and target those same consumers.

16           **1030. Exhibit 14, Page 297, Line 1-2 (between “think that at” and “the economic”).** This  
 17 text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert  
 18 claims would be offered to consumers through the Play Points program in the but-for world. This  
 19 information is non-public. If revealed publicly, an app store competitor could make decisions about its  
 20 own reward programs and the value of subsidies to offer consumers in order to better compete against  
 21 Google Play and target those same consumers. For example, a competitor to Google Play would be  
 22 able to use this information to meet or beat the subsidy offered by Google Play through its loyalty  
 23 program, and use that information to draw customers away from Google Play.

24           **1031. Exhibit 14, Page 297, Line 16-17 (between “to rise to” and “then it would be”).** This  
 25 text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert  
 26 claims would be offered to consumers through the Play Points program in the but-for world. This  
 27 information is non-public. If revealed publicly, an app store competitor could make decisions about its  
 28

own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers. For example, a competitor to Google Play would be able to use this information to meet or beat the subsidy offered by Google Play through its loyalty program, and use that information to draw customers away from Google Play.

**1032. Exhibit 14, Page 298, Line 9 (between “to give me” and “but, no,”) and Line 10 (between “want the” and “I want to spend”).** This text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert claims would be offered to consumers through the Play Points program in the but-for world. This information is non-public. If revealed publicly, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers. For example, a competitor to Google Play would be able to use this information to meet or beat the subsidy offered by Google Play through its loyalty program, and use that information to draw customers away from Google Play.

**1033. Exhibit 14, Page 298, Line 21 (between “hassle for the” and “subsidy”).** This text reflects and is calculated from internal, non-public Google financial data and data relating to Google’s Play Points reward program, including regarding the value of subsidy provided. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers.

**1034. Exhibit 14, Page 299, Line 6 (between “it goes up” and “that”).** This text contains non-public and confidential data regarding the percentage of subsidy Plaintiffs’ expert claims would be offered to consumers through the Play Points program in the but-for world. This information is non-public. If revealed publicly, an app store competitor could make decisions about its own reward programs and the value of subsidies to offer consumers in order to better compete against Google Play and target those same consumers. For example, a competitor to Google Play would be able to use this



information to meet or beat the subsidy offered by Google Play through its loyalty program, and use that information to draw customers away from Google Play.

**Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Hal Singer -**

**Exhibit 20 [Dkt. No. 508-21]**

**(Exhibit F5)**

1035. **Exhibit 20, Page -958.R (between "Expecting revenues" and "Play Balance Sheet"; all text below slide).** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. This information contains also non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1036. **Exhibit 20, Page -960.R (between "to last forecast:" and "excluding F/X"; all text below "excluding F/X and EC"; all figures in columns named "Outlook" and "Plan" and "FvB" and "FoF"; all text below slide).** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper

1 insight into the financial health and future outlook of the Play business, which also arguably gives  
2 Google's competitors an unfair advantage. This information contains also non-public information  
3 regarding Google's confidential non-public internal strategic considerations related to creating value  
4 for and attracting developers to the Google Play Store. This information has never been disclosed  
5 publicly. Disclosure of this information would adversely impact Google's current competitive position  
6 by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
7 away from Google.

8 **1037. Exhibit 20, Page -961.R (entire page).** This information reveals Google's internal non-  
9 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
10 by the company and their disclosure is likely to cause Google competitive harm and give its  
11 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
12 public data to modify or augment their business operations in an effort to compete unfairly against  
13 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
14 Google's competitors improper insight into the financial health and future outlook of the Play business,  
15 which also arguably gives Google's competitors an unfair advantage. This information contains also  
16 non-public information regarding Google's confidential non-public internal strategic considerations  
17 related to creating value for and attracting developers to the Google Play Store. This information has  
18 never been disclosed publicly. Disclosure of this information would adversely impact Google's current  
19 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
20 to attract developers away from Google.

21 **1038. Exhibit 20, Page -962.R (entire page).** This information reveals Google's internal non-  
22 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
23 by the company and their disclosure is likely to cause Google competitive harm and give its  
24 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
25 public data to modify or augment their business operations in an effort to compete unfairly against  
26 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
27 Google's competitors improper insight into the financial health and future outlook of the Play business,  
28

1 which also arguably gives Google's competitors an unfair advantage. This information contains also  
 2 non-public information regarding Google's confidential non-public internal strategic considerations  
 3 related to creating value for and attracting developers to the Google Play Store. This information has  
 4 never been disclosed publicly. Disclosure of this information would adversely impact Google's current  
 5 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
 6 to attract developers away from Google.

7 **1039. Exhibit 20, Page -963.R (entire page).** This information reveals Google's internal  
 8 non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly  
 9 reported by the company and their disclosure is likely to cause Google competitive harm and give its  
 10 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
 11 public data to modify or augment their business operations in an effort to compete unfairly against  
 12 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
 13 Google's competitors improper insight into the financial health and future outlook of the Play business,  
 14 which also arguably gives Google's competitors an unfair advantage. This information contains also  
 15 non-public information regarding Google's confidential non-public internal strategic considerations  
 16 related to creating value for and attracting developers to the Google Play Store. This information has  
 17 never been disclosed publicly. Disclosure of this information would adversely impact Google's current  
 18 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
 19 to attract developers away from Google.

20 **1040. Exhibit 20, Page -965.R (all figures in rows named "Global" and "JAPAC" and**  
 21 **"NA" and "EMEA" and "LATAM" and "BHN" and "ePay" and "InComm"; all text below**  
 22 **"good standing"; between "60+ affected by" and "Escalated the BD").** This information reveals  
 23 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
 24 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
 25 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
 26 internal, non-public data to modify or augment their business operations in an effort to compete  
 27 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple  
 28

years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. This information contains also non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google. The disclosure of a mobile carrier's highly confidential information would significantly harm the carrier's business. For example, the carrier's competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, the carrier proactively maintains the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

**1041. Exhibit 20, Page -966.R (between “paid on time.” and “Abandon Property”; all figures in rows named “Global” and “Aging Commerce” and “< 30 Days” and “30-90 Days” and “90 Days +” and “Total”; all text below “Abandon Property Opportunity”).** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. This information contains also non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact

Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**1042. Exhibit 20, Page -969.R (entire graph; between beginning bullet point and "in Japan consumer"; between "Dec 6) with" and "enrolled members"; between "spend coverage of" and "Revenue uplift"; between "Jan, targeting" and "of revenue uplift"; between "Q4 2018" and "No noticeable"; between "could range from" and "of total points"; between "points within" and "Source: "; between "edit#gid=0" and end of page).** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. This information contains also non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

**1043. Exhibit 20, Page -976.R (figures in columns named "Android" and "ChromeOS" and "Chrome" and "Play"; all text below slide).** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business,

1 which also arguably gives Google's competitors an unfair advantage. This information contains also  
2 non-public information regarding Google's confidential non-public internal strategic considerations  
3 related to creating value for and attracting developers to the Google Play Store. This information has  
4 never been disclosed publicly. Disclosure of this information would adversely impact Google's current  
5 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
6 to attract developers away from Google.

7 **1044. Exhibit 20, Page -977.R (entire chart and text below "4Q P&E P&L: Expected to**  
8 **land ahead of target").** This information reveals Google's internal non-public profit, revenue, and  
9 financial calculations. These data sets are not otherwise publicly reported by the company and their  
10 disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage.  
11 Google's competitors could improperly utilize this internal, non-public data to modify or augment their  
12 business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends  
13 in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the  
14 financial health and future outlook of the Play business, which also arguably gives Google's  
15 competitors an unfair advantage. This information contains also non-public information regarding  
16 Google's confidential non-public internal strategic considerations related to creating value for and  
17 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
18 Disclosure of this information would adversely impact Google's current competitive position by  
19 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
20 away from Google.

21 **1045. Exhibit 20, Page -978.R (entire slide; between "Did you know:" and "Tinder - #1";**  
22 **between "incl. GB, CA, IN)" and "LiveOps -"; between "Spring Deals promotion (" and end of**  
23 **paragraph).** This information reveals Google's internal non-public profit, revenue, and financial  
24 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
25 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
26 competitors could improperly utilize this internal, non-public data to modify or augment their business  
27 operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the  
28

1 data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
2 health and future outlook of the Play business, which also arguably gives Google's competitors an  
3 unfair advantage. This information contains also non-public information regarding Google's  
4 confidential non-public internal strategic considerations related to creating value for and attracting  
5 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
6 this information would adversely impact Google's current competitive position by enabling Google's  
7 competitors to mimic its confidential strategies in an effort to attract developers away from Google.  
8 The disclosure of developers' highly confidential information would significantly harm developers'  
9 business. For example, developers' competitors could leverage this information to reap an unearned  
10 competitive advantage. They could exploit this information—that they otherwise would not have  
11 access to—to inform their own business strategies. To prevent these competitive harms from coming to  
12 fruition, developers proactively maintain the confidentiality of its strategic information, only disclosing  
13 it to a select group of individuals on an as-needed basis.

14 **1046. Exhibit 20, Page -979.R (between “via rewards platform” and “Google Play**  
15 **Points”; between “Enhance developer partnerships” and end of slide).** This information reveals  
16 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
17 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
18 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
19 internal, non-public data to modify or augment their business operations in an effort to compete  
20 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple  
21 years) gives Google's competitors improper insight into the financial health and future outlook of the  
22 Play business, which also arguably gives Google's competitors an unfair advantage. This information  
23 contains also non-public information regarding Google's confidential non-public internal strategic  
24 considerations related to creating value for and attracting developers to the Google Play Store. This  
25 information has never been disclosed publicly. Disclosure of this information would adversely impact  
26 Google's current competitive position by enabling Google's competitors to mimic its confidential  
27 strategies in an effort to attract developers away from Google.



1           **1047. Exhibit 20, Page -980.R (between “could range from” and “of total points issued”;**  
2 **between “Google forgoes” and “in margin”; between “could range from” and “Similar to**  
3 **monetary”; between “could range from” and “of total points”; between “during the year” and**  
4 **“total points earned”).** This information reveals Google's internal non-public profit, revenue, and  
5 financial calculations. These data sets are not otherwise publicly reported by the company and their  
6 disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage.  
7 Google's competitors could improperly utilize this internal, non-public data to modify or augment their  
8 business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends  
9 in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the  
10 financial health and future outlook of the Play business, which also arguably gives Google's  
11 competitors an unfair advantage. This information contains also non-public information regarding  
12 Google’s confidential non-public internal strategic considerations related to creating value for and  
13 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
14 Disclosure of this information would adversely impact Google’s current competitive position by  
15 enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
16 away from Google.

17           **1048. Exhibit 20, Page -981.R (all text and charts below “Play Books - Project**  
18 **Platinum”).** This information reveals Google's internal non-public profit, revenue, and financial  
19 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
20 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
21 competitors could improperly utilize this internal, non-public data to modify or augment their business  
22 operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the  
23 data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
24 health and future outlook of the Play business, which also arguably gives Google's competitors an  
25 unfair advantage. This information contains also non-public information regarding Google’s  
26 confidential non-public internal strategic considerations related to creating value for and attracting  
27 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
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1 this information would adversely impact Google’s current competitive position by enabling Google’s  
2 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

3 **Google’s Reply In Support Of Motion to Exclude Opinions Offered by Hal Singer [Dkt. No. 524]**  
4 **(Exhibit G1)**

5 **1049. Page 1, Lines 10 to 11 (between “accounting for the” and “% of transactions”).**

6 This information contains non-public and confidential data regarding the percentage of downloads and  
7 purchases of paid apps ending in 99 cents on Google Play. This information has never been disclosed  
8 publicly. If publicly revealed, this information could influence the competitive decision-making and  
9 business strategies employed by Google’s app store competitors, for example by influencing how those  
10 app stores market themselves to U.S. developers and how they distinguish themselves from Google  
11 Play in the eyes of U.S. developers.

12 **1050. Page 4, Lines 10 to 12 (between “own internal analyses of” and “and”; between**  
13 **“and” and “id., shows”).** This information contains non-public information regarding specific  
14 business and financial strategies under consideration by Google, as well as Google’s confidential  
15 rationale for those strategies. This information has never been disclosed publicly. Disclosure of this  
16 information would severely and adversely impact Google’s current competitive position, as well as its  
17 ability to negotiate agreements in the future, because it would equip competitors and counterparties  
18 alike with insight into the concerns and objectives that drive Google’s strategic thinking. For example,  
19 public disclosure of specific business and financial strategies under consideration may lead Google’s  
20 competitors to pursue similar strategies, mimicking (and undermining) Google. Understanding  
21 Google’s non-public financial priorities could also give potential counterparties unfair leverage in  
22 future negotiations with Google, jeopardizing Google’s ability to negotiate business deals on arm’s  
23 length terms.

24 **1051. Page 5, Lines 20 to 25 (between “July 3, 2021,” and “% of U.S. customers”).** This  
25 information contains non-public and confidential data regarding the percentage of downloads and  
26 purchases of paid apps ending in 99 cents on Google Play. This information has never been disclosed  
27 publicly. If publicly revealed, this information could influence the competitive decision-making and  
28

1 business strategies employed by Google’s app store competitors, for example by influencing how those  
2 app stores market themselves to U.S. developers and how they distinguish themselves from Google  
3 Play in the eyes of U.S. developers.

4 **Google’s Motion to Exclude Opinions Offered by Marc Rysman -Exhibit 2 [Dkt. No. 484-3]**  
5 **(Exhibit H1)**

6 1052. **Page 21, Paragraph 22 (between “of roughly” and “for the period August 16,**  
7 **2016”; between “find to be approximately” and end of sentence).** This information reflects and is  
8 calculated from internal, non-public Google financial data. Were this information to be publicly  
9 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
10 Google financial information.

11 1053. **Page 39, Paragraph 47, Note 66 (between “GOOG-PLAY-000464354.R-400.R, at**  
12 **394.R (“” and “of device installs”; between “to sideloading” and “[;] Sharelt (and other”).** This  
13 information contains non-public and confidential data regarding the percentage of sideloaded installs  
14 on Google Play in India. This information has never been disclosed publicly and the Google Play  
15 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
16 competitive decision-making and business strategies employed by Google’s app store competitors, for  
17 example by influencing how those app stores market themselves to developers and how they  
18 distinguish themselves from Google Play in the eyes of developers. In addition, revealing the  
19 percentage of sideloaded apps on Google Play could influence the negotiating strategies and tactics  
20 employed by app developers and other current and prospective counterparties with which Google does  
21 or may transact business.

22 1054. **Page 43, Paragraph 52 (between “around” and “of apps on active”).** This  
23 information contains non-public and confidential data regarding the percentage of sideloaded apps on  
24 Google Play. This information has never been disclosed publicly and the Google Play product team  
25 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
26 decision-making and business strategies employed by Google’s app store competitors, for example by  
27 influencing how those app stores market themselves to U.S. developers and how they distinguish  
28

1 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the percentage of  
2 sideloaded apps on Google Play could influence the negotiating strategies and tactics employed by app  
3 developers and other current and prospective counterparties with which Google does or may transact  
4 business.

5 **1055. Page 43, Paragraph 52, Note 78 (between “sideloaded app” of” and “over the 2019**  
6 **and 2020;”).** This information contains non-public and confidential data regarding the percentage of  
7 sideloaded apps on Android. This information has never been disclosed publicly and the Google Play  
8 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
9 competitive decision-making and business strategies employed by Google’s app store competitors, for  
10 example by influencing how those app stores market themselves to U.S. developers and how they  
11 distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the  
12 percentage of sideloaded apps on Android could influence the negotiating strategies and tactics  
13 employed by app developers and other current and prospective counterparties with which Google does  
14 or may transact business.

15 **1056. Page 43-44, Paragraph 53 “account for only” and “of total app revenues”; between**  
16 **“account for approximately” and “and”; between “and” and “respectively.”).** This information  
17 reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
18 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
19 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
20 internal, non-public data to modify or augment their business operations in an effort to compete  
21 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple  
22 years) gives Google's competitors improper insight into the financial health and future outlook of the  
23 Play business, which also arguably gives Google's competitors an unfair advantage.

24 **1057. Page 44, Paragraph 53 (between “Google Play Store reached” and end of**  
25 **sentence).** This information reflects and is calculated from internal, non-public Google financial data.  
26 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
27 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
28

1 cause Google competitive harm by giving competitors insight into confidential Google financial  
2 information.

3 1058. **Page 44, Paragraph 53, Note 82 (between “and paid apps were” and end of**  
4 **sentence).** This information reflects and is calculated from internal, non-public Google financial data.  
5 Google spends significant resources compiling and maintaining this valuable data, which is non-public,  
6 and if revealed to competitors and potential business counterparties, could be used to disadvantage and  
7 cause Google competitive harm by giving competitors insight into confidential Google financial  
8 information.

9 1059. **Pages 64-65, Paragraph 79 (between ““Strong native distribution (“ and “of Play**  
10 **HVUs [high value users]”).** This information contains non-public and confidential data regarding the  
11 percentage of high value users on Google Play with an alternative app store preinstalled on their  
12 phones in South Korea. This information has never been disclosed publicly and the Google Play  
13 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
14 competitive decision-making and business strategies employed by Google’s app store competitors, for  
15 example by influencing how those app stores market themselves to U.S. developers and how they  
16 distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the  
17 percentage of high value users with app stores other than Google Play could influence the negotiating  
18 strategies and tactics employed by app developers and other current and prospective counterparties  
19 with which Google does or may transact business.

20 1060. **Page 65, Paragraph 80 (between “data demonstrates” and end of sentence;**  
21 **between “earning Play Points” and end of sentence).** This information reflects and is calculated  
22 from internal, non-public Google financial data. Were this information to be publicly revealed, it could  
23 cause Google competitive harm by giving competitors insight into confidential Google financial  
24 information.

25 1061. **Page 66, Paragraph 80, Exhibit 11 (entire chart).** This text reflects transactional  
26 figures calculated or derived from Google's financial data which is non-public information, and if  
27 revealed to competitors and potential business counterparties, could be used to disadvantage Google.

1 For example, if competitor platforms became aware of this information they could use it to inform  
2 their own strategies, unfairly leveraging Google's financial data to compete more effectively with  
3 Google Play.

4 **1062. Page 66, Paragraph 81 (between “steadily increased and” and “(see Exhibit 12”).**

5 This text reflects internal Google data on user behavior and marketing analytics. Google spends  
6 significant resources compiling and maintaining this valuable data, which is nonpublic information,  
7 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
8 Google. For example, Google's competitors could gain insight into Google's marketing analytics and  
9 knowledge of user behavior at no cost, improperly tailoring their own business strategy at Google's  
10 expense.

11 **1063. Page 67, Paragraph 81, Exhibit 12 (entire chart).** This text reflects internal Google

12 data on user behavior and marketing analytics. Google spends significant resources compiling and  
13 maintaining this valuable data, which is nonpublic information, and if revealed to competitors and  
14 potential business counterparties, could be used to disadvantage Google. For example, Google's  
15 competitors could gain insight into Google's marketing analytics and knowledge of user behavior at no  
16 cost, improperly tailoring their own business strategy at Google's expense.

17 **1064. Page 67, Paragraph 81, Exhibit 13 (entire chart).** This text reflects internal Google

18 data on user behavior and marketing analytics. Google spends significant resources compiling and  
19 maintaining this valuable data, which is nonpublic information, and if revealed to competitors and  
20 potential business counterparties, could be used to disadvantage Google. For example, Google's  
21 competitors could gain insight into Google's marketing analytics and knowledge of user behavior at no  
22 cost, improperly tailoring their own business strategy at Google's expense.

23 **1065. Page 69, Paragraph 84, Exhibit 14 (entire chart; footer between “Source: Google,”**  
24 **and “May 23, 2013”).** This text contains confidential, non-public information regarding Google’s  
25 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
26 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
27 competitor or potential business partner unfair leverage in competing against or negotiating with

Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1066. **Page 80, Paragraph 100 (between "gross margins increased from" and "in Q4 2012 to"; between "in Q4 2012 to" and "in FY 2013, saving"; between "in FY 2013, saving" and "in revenue sharing payments").** This text reflects revenue, operating profit, and gross profit margin figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1067. **Page 81, Paragraph 101 (between "any alternative to Google Play:" and "102. The RSA 3.0")** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1068. **Page 80-81, Paragraph 101 (between "Premier devices qualify for" and "of Net Ad Revenue"; between "Net Ad Revenue and up to" and "of Net Play Revenue"; between "tier devices," and end of the sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.



1           1069. **Page 80, Paragraph 101, Note 236 (between “GOOG-PLAY-000620282-321, at 305**  
 2 **(up to” and “of Net Play Revenue);”, between “(“Google will pay Company” and “of Net Play**  
 3 **Transaction Revenue”).** This text contains confidential, non-public information regarding Google’s  
 4 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
 5 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
 6 competitor or potential business partner unfair leverage in competing against or negotiating with  
 7 Google. Moreover, Google’s competitors could use this non-party information to unfairly target  
 8 Google's developer partners and offer specific deal terms designed to undercut those offered by  
 9 Google.

10           1070. **Page 87, Paragraph 107, Exhibit 16 (entire image).** This text contains confidential,  
 11 non-public information regarding Google’s agreements with non-party developers. Disclosure of this  
 12 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
 13 decision-making which, for example, could give a competitor or potential business partner unfair  
 14 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
 15 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
 16 designed to undercut those offered by Google.

17           1071. **Page 88, Paragraph 108 (between “multi-faceted approach to” and “and inhibit**  
 18 **the”; between “and inhibit the” and end of sentence; between “Galaxy Store’s ability to offer”**  
 19 **and “and, thus, limit”).** This information contains non-public information regarding Google’s  
 20 confidential non-public internal strategic considerations related to creating value for and attracting  
 21 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
 22 this information would adversely impact Google’s current competitive position by enabling Google’s  
 23 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

24           1072. **Page 88-89, Paragraph 108, Exhibit 17 (entire image).** This information contains  
 25 non-public information regarding Google’s confidential non-public internal strategic considerations  
 26 related to creating value for and attracting developers to the Google Play Store. This information has  
 27 never been disclosed publicly. Disclosure of this information would adversely impact Google’s current  
 28

1 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
2 to attract developers away from Google.

3       **1073. Page 90, Paragraph 109 (between "which accounted for approximately" and "of**  
4 **total consumer spend"; between "Google offered developers" and end of paragraph).** This text  
5 contains confidential, non-public information regarding Google's agreements with non-party  
6 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
7 as it reveals strategic decision-making which, for example, could give a competitor or potential  
8 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
9 competitors could use this non-party information to unfairly target Google's developer partners and  
10 offer specific deal terms designed to undercut those offered by Google.

11       **1074. Page 91, Paragraph 110 (between "on store," by" and "As an incentive"; between**  
12 **"revenue share of" and "on Google's revenue"; between "the Galaxy Store, plus a" and end of**  
13 **sentence).** This text contains confidential, non-public information regarding Google's agreements with  
14 non-party developers. Disclosure of this non-public information is likely to result in competitive harm  
15 to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
16 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
17 Google's competitors could use this non-party information to unfairly target Google's developer  
18 partners and offer specific deal terms designed to undercut those offered by Google.

19       **1075. Page 91, Paragraph 111 (between "in response to" and end of sentence; between**  
20 **"was designed to" and "to determine how to"; between "determine how to" and end of sentence).**  
21 This information contains non-public information regarding Google's confidential non-public internal  
22 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
23 This information has never been disclosed publicly. Disclosure of this information would adversely  
24 impact Google's current competitive position by enabling Google's competitors to mimic its  
25 confidential strategies in an effort to attract developers away from Google.

26       **1076. Page 109, Paragraph 148, Note 346 (between "apps is only" and "in Japan,";**  
27 **between "in Japan," and "in the U.S.,"; between "in the U.S.," and "in South Korea"; between**

1 **“South Korea, and” and “in India”**). This information contains non-public and confidential data  
2 regarding the share of active Android smart mobile devices with sideloaded apps on Android for  
3 certain countries. This information has never been disclosed publicly and the Android and Google Play  
4 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
5 competitive decision-making and business strategies employed by Google’s app store competitors, for  
6 example by influencing how those app stores market themselves to U.S. developers and how they  
7 distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the  
8 percentage of sideloaded apps on Android could influence the negotiating strategies and tactics  
9 employed by app developers and other current and prospective counterparties with which Google does  
10 or may transact business.

11 **1077. Page 110, Paragraph 151 (between “there is about a” and “drop off”)**. This  
12 information contains non-public and confidential data regarding sideloading on Google Play. This  
13 information has never been disclosed publicly and the Google Play product team treats it as strictly  
14 confidential. If publicly revealed, this information could influence the competitive decision-making  
15 and business strategies employed by Google’s app store competitors, for example by influencing how  
16 those app stores market themselves to U.S. developers and how they distinguish themselves from  
17 Google Play in the eyes of U.S. developers.

18 **1078. Page 110, Paragraph 151 (between “fewer [than]” and “of installs in”)**. This  
19 information contains non-public and confidential data regarding sideloaded app installs on Google  
20 Play. This information has never been disclosed publicly and the Google Play product team treats it as  
21 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
22 making and business strategies employed by Google’s app store competitors, for example by  
23 influencing how those app stores market themselves to U.S. developers and how they distinguish  
24 themselves from Google Play in the eyes of U.S. developers.

25 **1079. Page 111, Paragraph 152 (between “around” and “of apps”)**. This information  
26 contains non-public and confidential data regarding the percentage of sideloaded apps on Android.  
27 This information has never been disclosed publicly and the Google Play product team treats it as  
28

1 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
2 making and business strategies employed by Google's app store competitors, for example by  
3 influencing how those app stores market themselves to U.S. developers and how they distinguish  
4 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the percentage of  
5 sideloaded apps on Android could influence the negotiating strategies and tactics employed by app  
6 developers and other current and prospective counterparties with which Google does or may transact  
7 business.

8       **1080. Page 111, Paragraph 151, Note 354 (between "Android's "O" version," and "of**  
9 **"users who encountered").** This information contains non-public and confidential data regarding the  
10 percentage of sideloaded apps on Android. This information has never been disclosed publicly and the  
11 Google Play product team treats it as strictly confidential. If publicly revealed, this information could  
12 influence the competitive decision-making and business strategies employed by Google's app store  
13 competitors, for example by influencing how those app stores market themselves to U.S. developers  
14 and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition,  
15 revealing the percentage of sideloaded apps on Android could influence the negotiating strategies and  
16 tactics employed by app developers and other current and prospective counterparties with which  
17 Google does or may transact business.

18       **1081. Page 111, Paragraph 152, Note 355 (between "installs was below" and "countries**  
19 **(excluding China),"; between "sideloading was" and "worldwide").** This information contains  
20 non-public and confidential data regarding the percentage of sideloaded apps on Android. This  
21 information has never been disclosed publicly and the Google Play product team treats it as strictly  
22 confidential. If publicly revealed, this information could influence the competitive decision-making  
23 and business strategies employed by Google's app store competitors, for example by influencing how  
24 those app stores market themselves to U.S. developers and how they distinguish themselves from  
25 Google Play in the eyes of U.S. developers. In addition, revealing the percentage of sideloaded apps on  
26 Android could influence the negotiating strategies and tactics employed by app developers and other  
27 current and prospective counterparties with which Google does or may transact business.

1082. **Page 111, Paragraph 152, Note 356 (between “Note that” and “is calculated as”).**

This information contains non-public and confidential data regarding the percentage of sideloaded apps on Android. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the percentage of sideloaded apps on Android could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

1083. **Page 112, Paragraph 152 (between “‘off-Play’ was” and “in India,” between “in India,” and “in South Korea,” between “and only” and “in the United States”).** This information contains non-public and confidential data regarding the share of active Android smart mobile devices with sideloaded apps on Android for certain countries. This information has never been disclosed publicly and the Android and Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the percentage of sideloaded apps on Android could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

1084. **Page 112, Paragraph 152 (between “was between” and “during 2016 to 2018”).**

This information contains non-public and confidential data regarding the share of active Android smart mobile devices with sideloaded apps on Android for certain countries. This information has never been disclosed publicly and the Android and Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app

1 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
2 the eyes of U.S. developers. In addition, revealing the percentage of sideloaded apps on Android could  
3 influence the negotiating strategies and tactics employed by app developers and other current and  
4 prospective counterparties with which Google does or may transact business.

5 **1085. Page 121, Paragraph 170 (between “with an Android tablet have” and end of**  
6 **sentence).** This information contains non-public and confidential data regarding switching costs on  
7 Android. This information has never been disclosed publicly and the Android product team treats it as  
8 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
9 making and business strategies employed by Google’s app store and operating system competitors, for  
10 example by influencing how those app stores market themselves to U.S. developers and how they  
11 distinguish themselves from Google Play in the eyes of U.S. developers.

12 **1086. Page 130, Paragraph 187 (between “is approximately” and “in the US,”; between**  
13 **“in the US,” and “in the UK,”; between “in the UK, and” and “worldwide from”; between “the**  
14 **churn rate is” and “lower for consumers”; between “tablet and becomes” and “for Android”).**  
15 This information contains non-public and confidential data regarding switching costs on Android. This  
16 information has never been disclosed publicly and the Android product team treats it as strictly  
17 confidential. If publicly revealed, this information could influence the competitive decision-making  
18 and business strategies employed by Google’s app store and operating system competitors, for example  
19 by influencing how those app stores market themselves to U.S. developers and how they distinguish  
20 themselves from Google Play in the eyes of U.S. developers.

21 **1087. Page 139, Paragraph 201 (between “That is why” and “data shows that”; between**  
22 **“data shows that” and “of the time consumers”; between “consumers spent using” and “was**  
23 **with the native”; between “(with just” and “of time spent”).** The disclosure of this non-party app  
24 developer’s highly confidential information would significantly harm the developer’s business. For  
25 example, app competitors could leverage this information to reap an unearned competitive advantage.  
26 They could exploit this information—that they otherwise would not have access to—to inform their  
27 own business strategies. To prevent these competitive harms from coming to fruition, the non-party  
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1 app developer proactively maintains the confidentiality of its strategic information, only disclosing it  
2 to a select group of individuals on an as-needed basis.

3 1088. **Page 139, Paragraph 202 (between “Additionally,” and “data shows that during**  
4 **2020”; between “during 2020, only” and “of monthly active users”; between “while the**  
5 **remaining” and “users accessed”).** The disclosure of this non-party app developer’s highly  
6 confidential information would significantly harm the developer’s business. For example, app  
7 competitors could leverage this information to reap an unearned competitive advantage. They could  
8 exploit this information—that they otherwise would not have access to—to inform their own business  
9 strategies. To prevent these competitive harms from coming to fruition, the non-party app developer  
10 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
11 of individuals on an as-needed basis.

12 1089. **Page 144, Paragraph 209 (between “among gamers of” and “one of the most”;**  
13 **between “most popular” and “only”; between “only” and “played the game”; between**  
14 **“decreased to” and “in October 2021”).** The disclosure of this non-party app developer’s highly  
15 confidential information would significantly harm the developer’s business. For example, app  
16 competitors could leverage this information to reap an unearned competitive advantage. They could  
17 exploit this information—that they otherwise would not have access to—to inform their own business  
18 strategies. To prevent these competitive harms from coming to fruition, the non-party app developer  
19 proactively maintains the confidentiality of its strategic information, only disclosing it to a select group  
20 of individuals on an as-needed basis.

21 1090. **Page 144, Paragraph 209, Note 480 (between “See” and end of footnote).** The  
22 disclosure of this non-party app developer’s highly confidential information would significantly harm  
23 the developer’s business. For example, app competitors could leverage this information to reap an  
24 unearned competitive advantage. They could exploit this information—that they otherwise would not  
25 have access to—to inform their own business strategies. To prevent these competitive harms from  
26 coming to fruition, the non-party app developer proactively maintains the confidentiality of its  
27 strategic information, only disclosing it to a select group of individuals on an as-needed basis.



1           1091. **Page 148, Paragraph 217 (between “app downloads was about” and “on web-app**  
2 **access”; between “December 2021, only” and “of the amount spent”).** This confidential, non-  
3 public information reveals consumer spend on Play by region. If publicly revealed, this information  
4 could influence the competitive decision-making and business strategies employed by Google’s app  
5 store competitors, for example by influencing how those app stores market themselves to U.S.  
6 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

7           1092. **Page 149, Exhibit 37 (2020 and 2021 portion of bar graph).** This information  
8 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
9 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
10 competitors and potential business counterparties, could be used to disadvantage and cause Google  
11 competitive harm by giving competitors insight into confidential Google financial information.  
12 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
13 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
14 Google to gain an unfair advantage against Google.

15           1093. **Page 152, Paragraph 226 (between “Play Points offered to consumers” and “is the**  
16 **but-for price”).** This information reflects figures derived or calculated from non-public and  
17 confidential data related to Google's pricing strategies and consumer spending metrics for the Play  
18 Points program. This information is nonpublic, and the Google Play product team treats it as strictly  
19 confidential. If publicly revealed, this information could give competitors insight into Google's  
20 operations that Google lacks regarding its competitors, and would influence the competitive decision-  
21 making and business strategies employed by Google’s competitors, for example by influencing how  
22 those app stores market themselves to U.S. developers and how they distinguish themselves from  
23 Google Play in the eyes of U.S. developers.

24           1094. **Page 153, Paragraph 230 (between “for payments was” and “worldwide and”;**  
25 **between “worldwide and” and “in the U.S. in 2014,”.)** This text reflects Google Play’s effective  
26 rate for payments calculated or derived from Google's financial data which is non-public information,  
27 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
28

Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1095. **Page 153, Exhibit 28 (entire image between “Exhibit 28 and “Sources: Monthly App Review Data.”).** This text reflects and is drawn/calculated from internal Google financial data on consumer spending. Google spends significant resources compiling and maintaining this data, which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, Google's competitors could gain insight into Google's data by reverse engineering these figures and calculations, unfairly tailoring their own business strategy at Google's expense to compete more effectively with Google Play.

1096. **Page 153-154, Paragraph 230 (between “in the U.S. were about” and “in 2021, and in 2017”; between “(CC/PP, DCB, GC)” were” and “of customer spend”).** This text contains confidential, non-public information relating to Google's costs of processing transactions, specifically the numbers of U.S. consumers using DCB. This information is nonpublic. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies (e.g. change their own DCB offerings) in an effort to attract developers away from Google. This information could also be used by developers whose users do not transact, or minimally transact, with DCB, when entering into potential negotiations with Google Play.

1097. **Page 153, Paragraph 230 (between “Customer support costs at” and “of consumer spend”).** This text contains confidential, non-public information relating to Google's costs of processing transactions, specifically the percentage of consumer spend for customer support. This information is nonpublic. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies (e.g. change their own customer support offerings) in an effort to attract developers away from Google.

1098. **Page 153, Paragraph 230 (between “which Google notes are c.” and “of revenue.”).** This text contains confidential, non-public information relating to Google's costs of processing

1 transactions, specifically the cost of centralized infrastructure. This information is nonpublic.  
2 Disclosure of this information would adversely impact Google's current competitive position by  
3 enabling Google's competitors to mimic its confidential strategies (e.g. change their own centralized  
4 infrastructure) in an effort to attract developers away from Google.

5 1099. **Page 153, Paragraph 230, Note 509 (between "range from" and "% to"; between**  
6 **"% to" and "% of customer"; between "which are" and "% of customer"; between "Apps &"**  
7 **and "% for").** This text contains confidential, non-public information relating to Google's costs of  
8 processing transactions, specifically the costs of DCB and gift cards. This information is nonpublic.  
9 Disclosure of this information would adversely impact Google's current competitive position by  
10 enabling Google's competitors to mimic its confidential strategies (e.g. change their own DCB and gift  
11 card offerings) in an effort to attract developers away from Google. This information could also be  
12 used by developers whose users do not transact, or minimally transact, with DCB or gift cards, when  
13 entering into potential negotiations with Google Play.

14 1100. **Page 164, Paragraph 246, Note 542 (between "Offered to pay" and "effective at";**  
15 **between "effective at" and "signaled they could move"; between "signaled they could move to"**  
16 **and end of sentence).** This text contains confidential, non-public information regarding non-party  
17 developers, and implicates the non-parties' confidentiality interests by purporting to reveal the  
18 nonparties' confidential statements made during negotiations. Further, disclosure of this non-public  
19 information is likely to result in competitive harm to Google, as it reveals strategic decision-making,  
20 which, for example, could give a competitor or potential business partner unfair leverage in competing  
21 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
22 information to unfairly target Google's developer partners.

23 1101. **Page 167, Paragraph 252, Note 553 (between "In its discussions with" and "Google**  
24 **has considered"; between "considered allowing" and "without Google Play").** This text contains  
25 confidential, non-public information regarding non-party developers, and implicates the non-parties'  
26 confidentiality interests by purporting to reveal the nonparties' confidential statements made during  
27 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
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1 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 2 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
 3 Google's competitors could use this non-party information to unfairly target Google's developer  
 4 partners.

5 **1102. Page 170, Paragraph 256 (between “between “Google proposed countering with”**  
 6 **and “percentage points of its commission”; between “reflecting payment processing and” and**  
 7 **“percentage points reflecting”).** This text contains confidential, non-public information regarding  
 8 Google's agreements with non-party developers. Disclosure of this non-public information is likely to  
 9 result in competitive harm to Google, as it reveals strategic decision-making which, for example, could  
 10 give a competitor or potential business partner unfair leverage in competing against or negotiating with  
 11 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 12 Google's developer partners and offer specific deal terms designed to undercut those offered by  
 13 Google.

14 **1103. Page 171, Paragraph 256, Exhibit 33 (figures in slide in columns under “Spotify”**  
 15 **and “Google”, between “How do we frame this to Spotify” and end of bullet points; between**  
 16 **“Potential Framing” and “We believe these fees”).** This text contains confidential, non-public  
 17 information regarding Google's agreements with non-party developers. Disclosure of this non-public  
 18 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
 19 which, for example, could give a competitor or potential business partner unfair leverage in competing  
 20 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
 21 information to unfairly target Google's developer partners and offer specific deal terms designed to  
 22 undercut those offered by Google.

23 **1104. Page 171, Paragraph 257 (between “commission structure by proposing” and**  
 24 **“possible from”; between “possible from” and “such as creating”; between “such as creating”**  
 25 **and “and proposed”; between “and proposed” and “in the event that”; between “in the event**  
 26 **that” and end of sentence).** This information contains non-public information regarding Google's  
 27 confidential non-public internal strategic considerations related to creating value for and attracting  
 28

1 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
2 this information would adversely impact Google's current competitive position by enabling Google's  
3 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

4       **1105. Page 173-174, Paragraph 261 (between "Billing policies, including" and "to enable**  
5 **changes"; between "by February 2021" and the end of sentence; between "By March 2021," and**  
6 **"of the non-complaint").** This text contains confidential, non-public information regarding non-party  
7 developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google  
8 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
9 will maintain the confidentiality of contractual terms and its own confidential statements made during  
10 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
11 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
12 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
13 Google's competitors could use this non-party information to unfairly target Google's developer  
14 partners.

15       **1106. Page 179, Paragraph 273 (between "anywhere from" and the end of sentence).** This  
16 information contains non-public and confidential data regarding conversion rates off Google Play. This  
17 information has never been disclosed publicly and the Google Play product team treats it as strictly  
18 confidential. If publicly revealed, this information could influence the competitive decision-making  
19 and business strategies employed by Google's app store competitors, for example by influencing how  
20 those app stores market themselves to U.S. developers and how they distinguish themselves from  
21 Google Play in the eyes of U.S. developers.

22       **1107. Page 184, Paragraph 283, Exhibit 35 (Entire image beneath "Exhibit 35").** This text  
23 reflects Google's aggregate service fee rates drawn from figures which are non-public, and if revealed  
24 to competitors and potential business counterparties, could be used to disadvantage Google. For  
25 example, if app developers became aware of this information they could use it to inform their  
26 negotiation strategies and as leverage in negotiation with Google (e.g., by demanding new rates).

1108. **Page 185, Paragraph 286 (between “across developers was” and “in 2021”).** This text reflects Google's aggregate service fee rates drawn from figures which are non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if app developers became aware of this information they could use it to inform their negotiation strategies and as leverage in negotiation with Google (e.g., by demanding new rates).

1109. **Page 185, Paragraph 286 (between “I find that by 2021 only” and “of developers”; between “lower than 30%; thus,” and “of developers on average”).** This text reflects Google's aggregate service fee rates drawn from figures which are non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if app developers became aware of this information they could use it to inform their negotiation strategies and as leverage in negotiation with Google (e.g., by demanding new rates).

1110. **Page 185, Paragraph 287, Exhibit 36 (entire image).** The figure contains non-public, confidential information regarding the share of developers by service fee rate. This information is non-public and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those competitors' structure and set service fee rates.

1111. **Page 188, Paragraph 289, Exhibit 37 (entire image).** This text contains confidential, non-public information regarding Google's agreements with non-party carriers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's carrier partners and offer specific deal terms designed to undercut those offered by Google.

1112. **Page 188, Paragraph 290, n. 623 (between “explaining that Google saved” and “in cost of sales”; between “from renegotiating” and “+ rev share deals).”** This text contains confidential, non-public information regarding Google's agreements and negotiations with non-party

1 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
2 as it reveals strategic decision-making which, for example, could give a competitor or potential  
3 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
4 competitors could use this non-party information to unfairly target Google's developer partners and  
5 offer specific deal terms designed to undercut those offered by Google.

6 1113. **Page 190, Paragraph 295 (between “profit margins had been” and “consistently**  
7 **increasing over”; between “over time and reaching” and “in 2021.”).** This text reflects gross profit  
8 margin figures calculated or derived from Google's financial data which is non-public information, and  
9 if revealed to competitors and potential business counterparties, could be used to disadvantage Google.  
10 For example, if competitor platforms became aware of this information they could use it to inform  
11 their own strategies, unfairly leveraging Google's financial data to compete more effectively with  
12 Google Play.

13 1114. **Page 191, Paragraph 295, Exhibit 38 (entire exhibit).** This text reflects revenue,  
14 operating profit, and gross profit margin figures calculated or derived from Google's financial data  
15 which is non-public information, and if revealed to competitors and potential business counterparties,  
16 could be used to disadvantage Google. For example, if competitor platforms became aware of this  
17 information they could use it to inform their own strategies, unfairly leveraging Google's financial data  
18 to compete more effectively with Google Play.

19 1115. **Page 191, Paragraph 296 (between “Play Store ads — above” and “between 2018**  
20 **and 2021”).** This text reflects gross profit margin figures calculated or derived from Google's financial  
21 data which is non-public information, and if revealed to competitors and potential business  
22 counterparties, could be used to disadvantage Google. For example, if competitor platforms became  
23 aware of this information they could use it to inform their own strategies, unfairly leveraging Google's  
24 financial data to compete more effectively with Google Play.

25 1116. **Page 192, Paragraph 298 (between “margins are driven by” and end of sentence;**  
26 **between “A&G operating profit margin was” and “percent”; between “operating profit margin**  
27 **was” and “percent.”; between “profits are approximately” and end of sentence).** This text reflects  
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gross profit margin figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1117. **Page 192, Paragraph 298, Note 630 (between “on Play Store were” and end of sentence; between “Play Store was about” and “percent”; between “percent” and end of sentence; between “for 2019, 2020, and 2021 to be about” and “respectively”).** This text reflects revenue, operating profit, and gross profit margin figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1118. **Page 193, Paragraph 298, Exhibit 39 (entire image below “Google Play Profitability”).** This text reflects revenue, operating profit, and gross profit margin figures calculated or derived from Google's financial data which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Google. For example, if competitor platforms became aware of this information they could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more effectively with Google Play.

1119. **Page 195, Paragraph 303, Exhibit 40 (entire image between “Exhibit 40” and “Notes: 1. Shares are calculated”).** This information contains confidential and non-public information about the number of app stores on Android mobile devices. Revealing the number of app stores on Android mobile devices could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

1120. **Page 195, Paragraph 304 (between “Pre-Installations:” and end of sentence; between “Google’s” and “installed base”; (between “Play Store on” and “of the Android”).)** This

information contains non-public and confidential data regarding Google Play’s pre-installations on Android devices. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing Android devices with Google Play pre-installed could influence the negotiating strategies and tactics employed by OEMs and other current and prospective counterparties with which Google does or may transact business.

1121. **Page 196, Paragraph 304 (between “was pre-installed on” and “of Android mobile devices” and between “on less than” and “of Android”).** This information contains non-public and confidential data regarding pre-installation rates on Android devices. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers. In addition, revealing the percentage of pre-installed app stores on Android could influence the negotiating strategies and tactics employed by app developers and other current and prospective counterparties with which Google does or may transact business.

1122. **Page 196, Paragraph 305 (between “App Store Visits:” and end of first sentence; between “pre-installed on” and “of Android ”; between “achieved at most” and “share of”; between “2019 Google presentation,” and “of monthly”; between “outside of those in China):” and “of monthly”; between “Xiaomi Market, and” and “to Google Play”; between “reflects that” and “of all app store”; between “while only” and “of Android users”; between “visit the Google Play Store” and “each month.”; between “Google finds “the”” and “of all app store”).** This information contains non-public and confidential data regarding pre-installations on Android devices. This information has never been disclosed publicly and the Google Play product team treats it as

1 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
2 making and business strategies employed by Google’s app store competitors, for example by  
3 influencing how those app stores market themselves to U.S. developers and how they distinguish  
4 themselves from Google Play in the eyes of U.S. developers. In addition, revealing Android devices  
5 with Google Play pre-installed could influence the negotiating strategies and tactics employed by  
6 OEMs and other current and prospective counterparties with which Google does or may transact  
7 business.

8       **1123. Page 196-97, Paragraph 305 (between “averages less than” and “of total monthly”;**  
9 **between “global level and that” and “of users”).** The disclosure of an OEM’s highly confidential  
10 information would significantly harm the OEM’s business. For example, OEM competitors could  
11 leverage this information to reap an unearned competitive advantage. They could exploit this  
12 information—that they otherwise would not have access to—to inform their own business strategies.  
13 To prevent these competitive harms from coming to fruition, the OEM proactively maintains the  
14 confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-  
15 needed basis.

16       **1124. Page 197, Exhibit 41 (all data in row after “% of Android smart mobile devices**  
17 **with the app store pre-installed” and all data in row after “% of monthly app store visits from**  
18 **Android smart mobile devices with the app store pre-installed”).** This information contains non-  
19 public and confidential data regarding OEM App store pre-installation shares on Android. This  
20 information has never been disclosed publicly and the Google Play and Android product teams treat it  
21 as strictly confidential. Moreover, the disclosure of non-party OEMs’ highly confidential information  
22 would significantly harm these OEM’s businesses. For example, OEM competitors could leverage this  
23 information to reap an unearned competitive advantage. They could exploit this information—that they  
24 otherwise would not have access to—to inform their own business strategies.

25       **1125. Page 199, Paragraph 308 (between “User Engagement:” and end of sentence;**  
26 **between “Google presentation,” and “of worldwide”; between “with only” and “of OEM”;**  
27 **between “Galaxy Story and” and “on Xiaomi market”).** The disclosure of OEMs’ highly  
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1 confidential information would significantly harm the OEMs' businesses. For example, OEM  
2 competitors could leverage this information to reap an unearned competitive advantage. They could  
3 exploit this information—that they otherwise would not have access to—to inform their own business  
4 strategies. To prevent these competitive harms from coming to fruition, the OEMs proactively  
5 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
6 individuals on an as-needed basis.

7       **1126. Page 199, Exhibit 42 (all percentages).** This information contains non-public and  
8 confidential data regarding internal analyses of OEM app store usage shares worldwide (excluding  
9 China). This information has never been disclosed publicly and the Google Play product team treats it  
10 as strictly confidential. If publicly revealed, this information could influence the competitive decision-  
11 making and business strategies employed by Google's competitors, for example by influencing how  
12 other operating systems market themselves to app stores and how they distinguish themselves from  
13 Android in the eyes of other operating systems.

14       **1127. Page 200, Paragraph 309 (between "around" and "of apps on active".)** This  
15 information contains non-public and confidential data regarding app downloads on Android devices.  
16 This information has never been disclosed publicly and the Android product team treats it as strictly  
17 confidential. If publicly revealed, this information could influence the competitive decision-making  
18 and business strategies employed by Google's app store competitors, for example by influencing how  
19 those app stores market themselves to U.S. developers and how they distinguish themselves from  
20 Google Play in the eyes of U.S. developers. In addition, revealing the percentage of apps distributed  
21 off Google Play could influence the negotiating strategies and tactics employed by app developers and  
22 other current and prospective counterparties with which Google does or may transact business.

23       **1128. Page 205, Exhibit 47 (2020 and 2021 portion of bar graph).** This information  
24 contains non-public and confidential data regarding the number of developers on Google Play. This  
25 information has never been disclosed publicly and the Google Play product team treats it as strictly  
26 confidential. If publicly revealed, this information could influence the competitive decision-making  
27 and business strategies employed by Google's app store competitors, for example by influencing how  
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1 those app stores market themselves to U.S. developers and how they distinguish themselves from  
2 Google Play in the eyes of U.S. developers. In addition, revealing the number of app developers that  
3 distribute apps on Google Play could influence the negotiating strategies and tactics employed by app  
4 developers and other current and prospective counterparties with which Google does or may transact  
5 business.

6 **1129. Page 206, Exhibit 48 (bar graph).** This information contains non-public and  
7 confidential data regarding Android App distribution. This information has never been disclosed  
8 publicly and the Google Play and Android product teams treat it as strictly confidential. If publicly  
9 revealed, this information could influence the competitive decision-making and business strategies  
10 employed by Google's app store competitors, for example by influencing how those app stores market  
11 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
12 U.S. developers.

13 **1130. Page 210, Paragraph 324 (between "pays key OEMs up to" and "of its Google Play**  
14 **revenue"; between "(in addition to any" and "if the OEMs agree").** This text contains confidential,  
15 non-public information regarding Google's agreements with non-party developers. Disclosure of this  
16 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
17 decision-making which, for example, could give a competitor or potential business partner unfair  
18 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
19 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
20 designed to undercut those offered by Google.

21 **1131. Page 211, Paragraph 325 (between "a revenue share of" and "on Google's**  
22 **revenue"; between "plus a \$50m/year payment" and end of sentence).** This text contains  
23 confidential, non-public information regarding Google's agreements with non-party developers.  
24 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
25 strategic decision-making which, for example, could give a competitor or potential business partner  
26 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
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1 could use this non-party information to unfairly target Google's developer partners and offer specific  
2 deal terms designed to undercut those offered by Google.

3 1132. **Page 222, Paragraph 349 (between “they are higher than its” and “costs.”;**  
4 **between “lower service fee,” [m]aybe” and “would be more appropriate”).** This information  
5 contains non-public information regarding Google’s confidential non-public internal strategic  
6 considerations related to creating value for and attracting developers to the Google Play Store. This  
7 information has never been disclosed publicly. Disclosure of this information would adversely impact  
8 Google’s current competitive position by enabling Google’s competitors to mimic its confidential  
9 strategies in an effort to attract developers away from Google.

10 1133. **Page 222, Paragraph 349 (between “after year 1 will cost” and “and “GPB**  
11 **discount”; between “for small developers will cost” and “[.]”).** This text contains non-public and  
12 confidential information regarding an estimate of Google's marginal cost, relying on Google's non-  
13 public and confidential data. This information is non-public. If disclosed, this information could be  
14 used by Google's app store competitors to obtain a competitive advantage. For example, confidential  
15 information relating to a calculation of Google's marginal costs could influence how app store  
16 competitors structure their business models or what monetization strategies those competitors pursue to  
17 compete with Google. In addition, revealing a calculation of Google's marginal costs could influence  
18 the negotiating strategies and tactics employed by app developers and other current and prospective  
19 counterparties with which Google does or may transact business.

20 1134. **Page 222, Paragraph 349, Note 719 (between “at 555 (suggesting a” and “fee as**  
21 **opposed to a 30% fee”).** This information contains non-public information regarding Google’s  
22 confidential non-public internal strategic considerations related to creating value for and attracting  
23 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
24 this information would adversely impact Google’s current competitive position by enabling Google’s  
25 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

26 1135. **Page 223, Paragraph 350 (between “Google also offered” and “a”; between “a”**  
27 **and “revenue share.”; between “lower the revenue share to” and end of sentence).** This text  
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contains confidential, non-public information regarding Google's agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1136. **Page 223, Paragraph 350, Note 722 (between "Accelerator Program and met the requirements" and "and that would have been 15 percent).** This text reveals specific details about the terms of Google's agreements with developers as part of particular Google commercial programs. Public disclosure could cause harm to Google's competitive standing by giving competitors and others insights into Google's business strategies.

1137. **Page 223, Paragraph 350, Note 723 (between ("Offered" and "rev share per"; between "BD team pitched" and "a"; between "a" and "rev share of"; between "rev share of" and end of sentence).** This text contains confidential, non-public information regarding Google's agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1138. **Page 223, Paragraph 250 (between "Google and" and "agreed to a"; between "agreed to a" and "commission with"; between "commission with" and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and



offer specific deal terms designed to undercut those offered by Google. Further, this text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

1139. **Page 223, Paragraph 350, Note 724 (between beginning of paragraph and “-Google Play Better”; between “a per-transaction fee of” and “for the transactions”; between “billing system and” and end of sentence; between “a non-GBP solution,” and “ pays”; between “pays” and “commission”).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Further, this text contains confidential, non-public information regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

1140. **Page 223, Paragraph 350, Note 725 (between Between “Activate GPB globally at” and “(LRAP++), or Option 2.”; between “Activate GPB” and end of sentence; between “reduced rev share, but claim that” and “would not be net positive”; between “(or permanent?) rev share” and “and Google,”; between “GOOG-PLAY-001088669.R-687.R. at 673.R (Match,” and “among others,”; between “George Audi, Google, “Subject: Re:” and “GOOG-PLAY-000259276-279, at 277”; between GOOG-PLAY-000259276-279, at 277”; and “unlike most developers”; between “unlike most developers, views” and end of sentence).** This information contains non-public information regarding Google's confidential non-public internal strategic considerations related to

1 creating value for and attracting developers to the Google Play Store. This information has never been  
2 disclosed publicly. Disclosure of this information would adversely impact Google's current  
3 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
4 to attract developers away from Google. Further, this text contains confidential, non-public  
5 information regarding non-party developers, and implicates the non-party's confidentiality interests, by  
6 revealing the identity of Google business partners who are not party to this litigation, and who has a  
7 reasonable expectation that Google will maintain the confidentiality of contractual terms and its own  
8 confidential statements made during negotiations. Moreover, Google's competitors could use this non-  
9 party information to unfairly target Google's developer partners.

10       **1141. Page 223, Paragraph 350 (between "considered offering" and "a commission as";**  
11 **between "a commission as" and "has also, more recently,")**. This information contains non-public  
12 information regarding Google's confidential non-public internal strategic considerations related to  
13 creating value for and attracting developers to the Google Play Store. This information has never been  
14 disclosed publicly. Disclosure of this information would adversely impact Google's current  
15 competitive position by enabling Google's competitors to mimic its confidential strategies in an effort  
16 to attract developers away from Google.

17       **1142. Page 223, Paragraph 350 (between "offered 15% commission" and "to incentivize**  
18 **them to adopt")**. This information contains non-public information regarding Google's confidential  
19 non-public internal strategic considerations related to creating value for and attracting developers to  
20 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
21 information would adversely impact Google's current competitive position by enabling Google's  
22 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

23       **1143. Page 223-224, Paragraph 350 (between "Since 2020, it has offered a" and**  
24 **"commission to certain" and "certain developers of" and "requiring certain steps"; between**  
25 **"Google claims approximately" and "developers have taken advantage")**. This text reveals  
26 specific details about the terms of Google's agreements with developers as part of particular Google  
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1 commercial programs. Public disclosure could cause harm to Google's competitive standing by giving  
2 competitors and others insights into Google's business strategies.

3       **1144. Page 224, Paragraph 350, Note 729 (between “service fee for subscriptions” and**  
4 **“in 2021, see Exhibit 67.”).** This text reflects Google's aggregate service fee rates drawn from figures  
5 which are non-public, and if revealed to competitors and potential business counterparties, could be  
6 used to disadvantage Google. For example, if app developers became aware of this information they  
7 could use it to inform their negotiation strategies and as leverage in negotiation with Google (e.g., by  
8 demanding new rates).

9       **1145. Page 225, Paragraph 352 (between “transactions or developers (i.e.,” and “of**  
10 **transactions in 2020)”;** between **“of transactions in 2020) is”** and **“for the period from January**  
11 **2015”).** This text reflects Google's average commission rate changes drawn from figures which are  
12 non-public, and if revealed to competitors and potential business counterparties, could be used to  
13 disadvantage Google. For example, if app developers became aware of this information they could use  
14 it to inform their negotiation strategies and as leverage in negotiation with Google (e.g., by demanding  
15 new rates).

16       **1146. Page 226, Paragraph 354 (between “Play Store totaling” and “million in 2019.”).**  
17 This information reveals Google's internal non-public profit, revenue, and financial calculations. These  
18 data sets are not otherwise publicly reported by the company and their disclosure is likely to cause  
19 Google competitive harm and give its competitors an unfair advantage. Google's competitors could  
20 improperly utilize this internal, non-public data to modify or augment their business operations in an  
21 effort to compete unfairly against Google.

22       **1147. Page 226, Paragraph 354 (between “app sales in 2019 was” and “which accounts**  
23 **for”;** between **“which accounts for approximately”** and **“of its total revenue.”;** between **“in-app**  
24 **transactions is”** and **end of sentence).** This information reveals Google's internal non-public profit,  
25 revenue, and financial calculations. These data sets are not otherwise publicly reported by the company  
26 and their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
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1 advantage. Google's competitors could improperly utilize this internal, non-public data to modify or  
2 augment their business operations in an effort to compete unfairly against Google.

3 1148. **Page 226, Paragraph 354, Note 738 (between “for the years 2017-2021 is” and**  
4 **“comprising”; between “comprising” and “of its total revenues”; between “same period**  
5 **(totalling” and end of sentence).** This information reveals Google's internal non-public profit,  
6 revenue, and financial calculations. These data sets are not otherwise publicly reported by the company  
7 and their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
8 advantage. Google's competitors could improperly utilize this internal, non-public data to modify or  
9 augment their business operations in an effort to compete unfairly against Google. Moreover, visibility  
10 into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper  
11 insight into the financial health and future outlook of the Play business, which also arguably gives  
12 Google's competitors an unfair advantage.

13 1149. **Page 227, Paragraph 354 (between “other Android app stores is” and “the**  
14 **Samsung Galaxy”; between “or approximately” and “in 2019”).** This text reflects revenue figures  
15 calculated or derived for Google and a non-party partner from Google's financial data which is non-  
16 public information, and if revealed to competitors and potential business counterparties, could be used  
17 to disadvantage Google. For example, if competitor platforms became aware of this information they  
18 could use it to inform their own strategies, unfairly leveraging Google's financial data to compete more  
19 effectively with Google Play. Furthermore, the disclosure of the non-party's highly confidential  
20 information would significantly harm Google's partner's business. For example, the non-party's  
21 competitors could leverage this information to reap an unearned competitive advantage. They could  
22 exploit this information—that they otherwise would not have access to—to inform their own business  
23 strategies.

24 1150. **Page 227, Paragraph 354-55, bottom of page (between “from the Galaxy Store in**  
25 **2019 of” and “to”; between “to” and “or an average of”; between “or an average of” and “as a**  
26 **reasonable proxy”).** This text contains confidential, non-public information regarding non-party  
27 partners, and implicates the non-party's confidentiality interests, by revealing Google's estimates of  
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1 the non-party's revenue.. Further, disclosure of this non-public information is likely to result in  
2 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
3 competitor or potential business partner unfair leverage in competing against or negotiating with  
4 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
5 Google's partner.

6 **1151. Page 227, Paragraph 354 (between "calculated as approximately" and "in 2019**  
7 **using").** This information reveals Google's internal non-public profit, revenue, and financial  
8 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
9 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
10 competitors could improperly utilize this internal, non-public data to modify or augment their business  
11 operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the  
12 data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
13 health and future outlook of the Play business, which also arguably gives Google's competitors an  
14 unfair advantage.

15 **1152. Page 227, Paragraph 354 (between "installs from Samsung Galaxy Store" and**  
16 **"Aptoide", between "Aptoide" and "and ONE store"; between "ONE store" and end of**  
17 **sentence.)** This information contains non-public and confidential data regarding the global share of  
18 monthly app store visits on Android. This information has never been disclosed publicly and the  
19 Android product team treats it as strictly confidential. If publicly revealed, this information could  
20 influence the competitive decision-making and business strategies employed by Google's app store  
21 competitors, for example by influencing how those app stores market themselves to U.S. developers  
22 and how they distinguish themselves from Google Play in the eyes of U.S. developers.

23 **1153. Page 227, Paragraph 354 (between "gap of about" and "approximates"; between**  
24 **"Samsung" and end of sentence).** This information contains non-public and confidential data  
25 regarding the global share of monthly app store visits on Android. This information has never been  
26 disclosed publicly and the Android product team treats it as strictly confidential. If publicly revealed,  
27 this information could influence the competitive decision-making and business strategies employed by  
28

Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1154. **Page 227, Paragraph 354 (between "Vivo App Store" and "are"; between "are" and "the global share"; between "Samsung Galaxy Store" and "I also know").** This information contains non-public and confidential data regarding the global share of monthly app store visits on Android. This information has never been disclosed publicly and the Android product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1155. **Page 228, Paragraph 355 (between is "therefore approximately" and "calculated as Google Play"; between "transaction revenues of" and "divided by the"; between "transactions of" and end of sentence; between "a growth rate of" and "for Amazon's IAP revenues").** This information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage.

1156. **Page 228, Paragraph 356 (between "I consider" and "to be a lower").** This text describes non-public, hypothetical financial figures relating to Google's market share, which is based on non-public competitively sensitive financial data. If publicly revealed, this information could affect Google's negotiating position with future partners, affect Google customer perception regarding perceived value, or lead to conjecture about Google's future financials based on Dr. Rysman's hypothetical model that is not based in fact.

1           **1157. Page 226, Paragraph 354 (between “Amazon App store” and “in 2018, to”;**  
2 **between “in 2018, to” and “in 2019,”; between “in 2019,” and “in 2020”).** The disclosure of a non-  
3 party app store’s highly confidential information would significantly harm the non-party’s business.  
4 For example, app store competitors could leverage this information to reap an unearned competitive  
5 advantage. They could exploit this information—that they otherwise would not have access to—to  
6 inform their own business strategies. To prevent these competitive harms from coming to fruition, the  
7 non-party proactively maintains the confidentiality of its strategic information, only disclosing it to a  
8 select group of individuals on an as-needed basis.

9           **1158. Page 228, Paragraph 355, Note 745 (between “did not grow as fast as” and “(which**  
10 **is likely),”).** The disclosure of a non-party app store’s highly confidential information would  
11 significantly harm the non-party’s business. For example, app store competitors could leverage this  
12 information to reap an unearned competitive advantage. They could exploit this information—that they  
13 otherwise would not have access to—to inform their own business strategies. To prevent these  
14 competitive harms from coming to fruition, the non-party proactively maintains the confidentiality of  
15 its strategic information, only disclosing it to a select group of individuals on an as-needed basis.

16           **1159. Page 228, Exhibit 52 (all data beneath columns headings 2017, 2018, 2019 2020 and**  
17 **2021 in both tables).** This information reflects and is calculated from internal, non-public Google and  
18 non-parties’ financial data. Google spends significant resources compiling and maintaining this  
19 valuable data, which is non-public, and if revealed to competitors and potential business  
20 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
21 competitors insight into confidential Google financial information. The disclosure of the non-parties’  
22 highly confidential information would significantly harm the non-parties’ business. For example, app  
23 store competitors could leverage this information to reap an unearned competitive advantage. They  
24 could exploit this information—that they otherwise would not have access to—to inform their own  
25 business strategies.

26           **1160. Page 229, Para. 357 (between “For example,” and “wanted to use its own in-app**  
27 **billing”).** This text contains confidential, non-public information regarding non-party developers, and  
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1 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
2 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
3 maintain the confidentiality of contractual terms and its own confidential statements made during  
4 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
5 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
6 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
7 Google's competitors could use this non-party information to unfairly target Google's developer  
8 partners.

9       **1161. Page 229, Paragraph 357, Note 748 (between "See, Google," and "Code Yellow**  
10 **Proposal,"; between "GOOG-PLAY-000262353.R-389.R, at 359.R" and "needs to justify the").**  
11 This text contains confidential, non-public information regarding non-party developers, and implicates  
12 the non-party's confidentiality interests, by revealing the identity of Google business partners who are  
13 not party to this litigation, and who has a reasonable expectation that Google will maintain the  
14 confidentiality of contractual terms and its own confidential statements made during negotiations.  
15 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
16 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
17 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
18 competitors could use this non-party information to unfairly target Google's developer partners.

19       **1162. Page 230, Paragraph 361 (between "transactions (approximately" and "from 2018**  
20 **to 2020)," between "(still averaging" and "in 2021 – see Exhibit 35)").** This text contains non-  
21 public and confidential information regarding the actual or effective service fee charged by Google  
22 Play to developers for transactions on Google Play. If disclosed, it would reveal implicit information  
23 about the portion of developers or transactions paying Google Play's 30% service fee as compared to  
24 other service fee rates offered through Google Play's various service fee programs. Revealing this  
25 information would undermine Google Play's competitive position by providing developers with a  
26 datapoint to challenge Google Play's service fee or demand better terms in negotiations.

1163. **Page 241, Paragraph 385 (between “Google spent” and “on “partner revenue share””; between “projected to spend” and “to drive device penetration,”; between “to drive device penetration, and” and “to drive Google services”; between “to spend a total of” and “in 2020 across Search”; between “increase the total spend to” and “in 2023.”).** This text reveals non-public, recent, and competitively sensitive Google financial information, including around Google costs and operating expenses. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into consumer spending and confidential Google costs figures.

1164. **Page 243-44, Paragraph 391 (between “RSA 3.0 is” and end of sentence; between “RSA deals” were to” and “including seeking”; between “including seeking” and “in the light of”; between “such as” and end of sentence).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1165. **Page 245, Paragraph 393, Note 815 (between “top 16 OEMs received” and “in revenue share”).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1166. **Page 245-46, Paragraph 394 (between “RSAs from nearly” and “to”; between “to” and end of sentence; between “RSA 3.0 Premier Tier is” and “in Great Britain”; between “and**

1 **at least” and “in France,”; between “versions reach between” and “to”; between “to” and “in**  
2 **these countries”; between “2019 around” and “of new Android”).** This text contains confidential,  
3 non-public information regarding Google’s agreements with non-party developers. Disclosure of this  
4 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
5 decision-making which, for example, could give a competitor or potential business partner unfair  
6 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
7 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
8 designed to undercut those offered by Google.

9 **1167. Page 246, Exhibit 55 (between “Exhibit 55” and “Source: Google, “Android**  
10 **Commercial Agreements”, including entire slide and caption).** This information reflects and is  
11 calculated from internal, non-public Google financial data. Google spends significant resources  
12 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and  
13 potential business counterparties, could be used to disadvantage and cause Google competitive harm  
14 by giving competitors insight into confidential Google financial information. Further, this information  
15 reflects sensitive, highly confidential characterizations by Google's internal business teams that, if  
16 revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair  
17 advantage against Google.

18 **1168. Page 246-47, Paragraph 395 (between “premier tier devices, including” and end of**  
19 **the sentence; between “Further,” and “of devices on Premier exceed”).** This text contains  
20 confidential, non-public information regarding non-party OEM, and implicates the non-party’s  
21 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
22 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
23 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
24 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
25 decision-making, which, for example, could give a competitor or potential business partner unfair  
26 leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use  
27 this non-party information to unfairly target Google’s partners.

1           1169. **Page 250, Exhibit 59 (all company names in Company column; company name in**  
2 **footnote 3).** This text contains confidential, non-public information regarding non-party OEMs, and  
3 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
4 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
5 maintain the confidentiality of contractual terms and its own confidential statements made during  
6 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
7 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
8 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
9 Google's competitors could use this non-party information to unfairly target Google's partners.

10           1170. **Page 253-54, Paragraph 404 (between "per year" and "amounting to"; between**  
11 **"amounting to" and end of sentence).** This text contains confidential, non-public information  
12 regarding Google's agreements with non-party developers. Disclosure of this non-public information is  
13 likely to result in competitive harm to Google, as it reveals strategic decision-making which, for  
14 example, could give a competitor or potential business partner unfair leverage in competing against or  
15 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
16 unfairly target Google's developer partners and offer specific deal terms designed to undercut those  
17 offered by Google.

18           1171. **Page 254, Para. 405 (between "Samsung a revenue share of" and "on Google's**  
19 **revenue"; between "year payment" and the end of the sentence.)** This text contains confidential,  
20 non-public information regarding Google's agreements with non-party developers. Disclosure of this  
21 non-public information is likely to result in competitive harm to Google, as it reveals strategic  
22 decision-making which, for example, could give a competitor or potential business partner unfair  
23 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
24 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
25 designed to undercut those offered by Google.

26           1172. **Page 254, Paragraph 405, Note 834 (between "Samsung interpreted the" and**  
27 **"Banyan proposal").** This text contains confidential, non-public information regarding Google's  
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1 agreements with non-party developers. Disclosure of this non-public information is likely to result in  
 2 competitive harm to Google, as it reveals strategic decision-making which, for example, could give a  
 3 competitor or potential business partner unfair leverage in competing against or negotiating with  
 4 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
 5 Google's developer partners and offer specific deal terms designed to undercut those offered by  
 6 Google.

7       **1173. Page 256-57, Exhibit 61, Sources 4. (between “Google and” and ““MADA,’**  
 8 **October”;** between “Google and” and ““MADA,’ August”; between “Google and” and  
 9 **““MADA,’ November”;** between “Google and” and ““MADA,’ July”; “Google and” and  
 10 **““MADA,’ July”;** “Google and” and ““MADA,’ July”; “Google and” and ““MADA,’ August”;  
 11 **“Google and” and ““MADA,’ September”;** between “Google and” and ““MADA,’ October”).

12 This text contains confidential, non-public information regarding non-party OEMs, and implicates the  
 13 non-party's confidentiality interests, by revealing the identity of Google business partners who are not  
 14 party to this litigation, and who has a reasonable expectation that Google will maintain the  
 15 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 16 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 17 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 18 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 19 competitors could use this non-party information to unfairly target Google's OEM partners.

20       **1174. Page 259, Paragraph 412, Note 846 (between “Subject Re:” and “app,” June 06,**  
 21 **2019”).** This text contains confidential, non-public information regarding non-party developers, and  
 22 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
 23 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
 24 maintain the confidentiality of contractual terms and its own confidential statements made during  
 25 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 26 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 27 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
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1 Google's competitors could use this non-party information to unfairly target Google's developer  
2 partners.

3 1175. **Page 259, Paragraph 414, Note 851 (between "Google and" and "MADA," October**  
4 **1, 2017"; between "Google and" and "MADA," August 1, 2017,"; between "Google and" and**  
5 **"MADA," November 1, 2017,")**. This text contains confidential, non-public information regarding  
6 non-party OEMs, and implicates the non-party's confidentiality interests, by revealing the identity of  
7 Google business partners who are not party to this litigation, and who has a reasonable expectation that  
8 Google will maintain the confidentiality of contractual terms and its own confidential statements made  
9 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
10 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
11 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
12 Google's competitors could use this non-party information to unfairly target Google's OEM partners.

13 1176. **Page 261-62, Exhibit 63, Sources 3. (between "see also Email from" and "to Eric";**  
14 **between "Management at" and "Subject"; between "2020" and "-00142728")**. This text contains  
15 confidential, non-public information regarding non-party OEMs, and implicates the non-party's  
16 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
17 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
18 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
19 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
20 decision-making, which, for example, could give a competitor or potential business partner unfair  
21 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
22 this non-party information to unfairly target Google's OEM partners.

23 1177. **Page 274, Paragraph 431, Note 883 (between "Android prior to O," and "of**  
24 **users"; between "meaning that nearly" and "of users"; between "that "fewer [than]" and "of**  
25 **installs in")**. This information contains non-public and confidential data regarding app installations on  
26 Android. Google spends significant resources compiling and maintaining this valuable data, which is  
27 non-public information, and if revealed to competitors and potential business counterparties, could be  
28

1 used to disadvantage Google. For example, Google's competitors could gain insight into Google's data  
2 on app downloads and knowledge of user behavior at no cost, unfairly tailoring their own business  
3 strategy at Google's expense.

4 1178. **Page 274, Paragraph 432 (between “because only” and “of U.S. users”).** This  
5 information contains non-public and confidential data regarding app installations on Android. Google  
6 spends significant resources compiling and maintaining this valuable data, which is non-public  
7 information, and if revealed to competitors and potential business counterparties, could be used to  
8 disadvantage Google. For example, Google's competitors could gain insight into Google's data on app  
9 downloads and knowledge of user behavior at no cost, unfairly tailoring their own business strategy at  
10 Google's expense.

11 1179. **Page 277, Paragraph 435 (between “December 2020,” and “of installed”).** This  
12 information contains non-public and confidential data regarding app installations on Android. Google  
13 spends significant resources compiling and maintaining this valuable data, which is non-public  
14 information, and if revealed to competitors and potential business counterparties, could be used to  
15 disadvantage Google. For example, Google's competitors could gain insight into Google's data on app  
16 downloads and knowledge of user behavior at no cost, unfairly tailoring their own business strategy at  
17 Google's expense.

18 1180. **Page 277, Paragraph 436 (between “risk is miniscule’ and” and “of installs from”).**  
19 This information contains non-public and confidential data regarding app installations on Android.  
20 Google spends significant resources compiling and maintaining this valuable data, which is non-public  
21 information, and if revealed to competitors and potential business counterparties, could be used to  
22 disadvantage Google. For example, Google's competitors could gain insight into Google's data on app  
23 downloads and knowledge of user behavior at no cost, unfairly tailoring their own business strategy at  
24 Google's expense.

25 1181. **Page 282, Paragraph 445 (between “for approximately” and “of total”; between**  
26 **“Google offered” and end of sentence.)** This text contains confidential, non-public information  
27 regarding Google’s agreements with non-party developers. Disclosure of this non-public information is  
28



likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1182. **Page 282, Paragraph 445, Note 927 (between “(noting that the” and “was aimed at ensuring”; between “was aimed at ensuring” and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1183. **Page 283, Paragraph 447 (between “New Titles, including (i)” and “and (ii)”; between “and (ii)” and “will be made available”; between “also require that” and “of games subject to”; between “developer agrees to” and end of sentence).** This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1184. **Page 283-284, Paragraph 447, Note 930 (between “GOOG-PLAY-007273439-444, at § 3.A; see also Google and” and “Google Play Games”; between “GOOG-PLAY-007335447-450, at § 3.A(similar); Google and” and “Google Play Games”; between GOOG-PLAY-007273267-272, at § 3.A (similar with” and “Google and Electronic Arts,”; between “GOOG-PLAY-010662251-255, at § 3.A (similar with” and “); Google and King,”; between “GOOG-**

PLAY-007273051-054, at § 3.A (same as Activation Clause); Google and” and “Google Play Games”; between “GOOG-PLAY-007273160-164, at § 3.A (similar); Google and” and “Google Play Games”; between “exceptions from Google); Google and” and “Google Play Games”; between “business models”); Google and” and “Google Play Games”; between “(i.e. outside of China)); Google and” and “Google Play Games”; between “GOOG-PLAY-007273234-238, at § 3.A (similar); Google and” and “Google Play Games”; between “GOOG-PLAY-010661066-069, at § 3.A (similar); Google and” and “Google Play Games”; between “GOOG-PLAY-007335585-595, at § 3.A (similar); Google and” “Google Play Games”; between “GOOG-PLAY-007847579-583, at § 3.A (similar); Google and” and “Google Play Games”; between “GOOG-PLAY-007335471-475, at § 3.A (similar with” and “Google and”, between “Google and”, and “Google Play Games”; between “GOOG-PLAY-007273404-408, at § 3.A (similar with” and end of sentence.) This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1185. Page 284-85, Paragraph 448 (between “offered to the developer” and “a”; between “a” and “to strengthen partnership”; between “on Android” because” and “showed interest”; between “Store of approximately” and end of sentence; between “Google believed that, “[i]f [” and “moves] to [its] own app store,”; between “if other developers “follow [” and “[ strategy.”; between “DCB rev- share deal to ensure” and “uses Play”; between “platform for their” and “devices,”). This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google

1 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
2 will maintain the confidentiality of contractual terms and its own confidential statements made during  
3 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
4 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
5 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
6 Google's competitors could use this non-party information to unfairly target Google's developer  
7 partners.

8       1186. **Page 285, Paragraph 448, Note 934 (between "Assessment of" and "Partnership**  
9 **Opportunities,")**. This text contains confidential, non-public information regarding non-party  
10 developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google  
11 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
12 will maintain the confidentiality of contractual terms and its own confidential statements made during  
13 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
14 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
15 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
16 Google's competitors could use this non-party information to unfairly target Google's developer  
17 partners.

18       1187. **Page 285, Paragraph 448, Note 935 (between "Confirmed:" and "May 15, 2017,")**.  
19 This text contains confidential, non-public information regarding non-party developers, and implicates  
20 the non-party's confidentiality interests, by revealing the identity of Google business partners who are  
21 not party to this litigation, and who has a reasonable expectation that Google will maintain the  
22 confidentiality of contractual terms and its own confidential statements made during negotiations.  
23 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
24 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
25 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
26 competitors could use this non-party information to unfairly target Google's developer partners.

1188. **Page 285, Paragraph 449 (between start of sentence and “was planning to build”; between “optimized for” and “games including”; between “games including” and “in an effort”; between “effort to retain” and “high value users”; between “personnel observed,” and “believes that”; between “Google and” and “executed a Games”; between “2019 with” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1189. **Page 285, Paragraph 449, Note 936 (between “Subject: Re:” and “support in”; between “support in” and “April 12, 2017,”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1190. **Page 285, Paragraph 449, Note 937 (between “Subject: Re:” and “support in”; between “support in” and “April 12, 2017,”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to

1 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
2 could give a competitor or potential business partner unfair leverage in competing against or  
3 negotiating with Google. Moreover, Google’s competitors could use this non-party information to  
4 unfairly target Google’s developer partners.

5       **1191. Page 285, Paragraph 449, Note 938 (between “Google and” and “Google Play**  
6 **Games”).** This text contains confidential, non-public information regarding non-party developers, and  
7 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
8 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
9 maintain the confidentiality of contractual terms and its own confidential statements made during  
10 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
11 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
12 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
13 Google’s competitors could use this non-party information to unfairly target Google’s developer  
14 partners.

15       **1192. Page 285-86, Para. 450 (between “Google offers” and “to the developer, and**  
16 **developers”; between “to the developer, and developers” and end of sentence.** This text contains  
17 confidential, non-public information regarding Google’s agreements with non-party developers.  
18 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
19 strategic decision-making which, for example, could give a competitor or potential business partner  
20 unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors  
21 could use this non-party information to unfairly target Google’s developer partners and offer specific  
22 deal terms designed to undercut those offered by Google.

23       **1193. Page 286, Paragraph 450, Note 940 (between “See also, Google and” and “Apps**  
24 **Velocity Program”; between GOOG-PLAY-009214167-177, at 168-171; Google and” and “Apps**  
25 **Velocity Program”; between GOOG-PLAY-011249830-841, at 832-836; Google and” and “Apps**  
26 **Velocity Program” between “GOOG-PLAY 011249875- 887, at 876-882; and Google and” and**  
27 **“Attachment A Marketing Activity”).** This text contains confidential, non-public information

1 regarding non-party developers, and implicates the non-party's confidentiality interests, by revealing  
 2 the identity of Google business partners who are not party to this litigation, and who has a reasonable  
 3 expectation that Google will maintain the confidentiality of contractual terms and its own confidential  
 4 statements made during negotiations. Further, disclosure of this non-public information is likely to  
 5 result in competitive harm to Google, as it reveals strategic decision-making, which, for example,  
 6 could give a competitor or potential business partner unfair leverage in competing against or  
 7 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
 8 unfairly target Google's developer partners.

9       **1194. Page 286, Paragraph 450 (between "Developers" and "are developers that").** This  
 10 text contains confidential, non-public information regarding non-party developers, and implicates the  
 11 non-party's confidentiality interests, by revealing the identity of Google business partners who are not  
 12 party to this litigation, and who has a reasonable expectation that Google will maintain the  
 13 confidentiality of contractual terms and its own confidential statements made during negotiations.  
 14 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
 15 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
 16 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
 17 competitors could use this non-party information to unfairly target Google's developer partners.

18       **1195. Page 286, Paragraph 450, Note 941 (between "Google and" and "Apps Velocity**  
 19 **Program"; between "GOOG-PLAY-009214167-177; Google and" and "Apps Velocity**  
 20 **Program"; between GOOG-PLAY 011249830-841; Google and" and "Apps Velocity Program";**  
 21 **between "GOOG-PLAY-011249875-887; and Google and" and "Attachment A Marketing**  
 22 **Activity").** This text contains confidential, non-public information regarding non-party developers,  
 23 and implicates the non-party's confidentiality interests, by revealing the identity of Google business  
 24 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
 25 maintain the confidentiality of contractual terms and its own confidential statements made during  
 26 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
 27 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
 28



1 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
2 Google's competitors could use this non-party information to unfairly target Google's developer  
3 partners.

4 1196. **Page 286-87, Paragraph 452 (between "a success, resulting in" and "Play risk**  
5 **mitigation.").** This information contains non-public information regarding Google's confidential non-  
6 public internal strategic considerations related to creating value for and attracting developers to the  
7 Google Play Store. This information has never been disclosed publicly. Disclosure of this information  
8 would adversely impact Google's current competitive position by enabling Google's competitors to  
9 mimic its confidential strategies in an effort to attract developers away from Google.

10 1197. **Page 294-95, Paragraph 468 (between "has offered commissions" and "and";**  
11 **between "and" and "under various discount programs").** This text contains confidential, non-  
12 public information regarding Google's agreements with non-party developers. Disclosure of this non-  
13 public information is likely to result in competitive harm to Google, as it reveals strategic decision-  
14 making which, for example, could give a competitor or potential business partner unfair leverage in  
15 competing against or negotiating with Google. Moreover, Google's competitors could use this non-  
16 party information to unfairly target Google's developer partners and offer specific deal terms designed  
17 to undercut those offered by Google.

18 1198. **Page 294, Paragraph 467 (between "estimated its transaction costs to be" and**  
19 **"percent of revenue").** This text reveals non-public, recent, and competitively sensitive Google  
20 financial information, including around Google costs and operating expenses. Were this information to  
21 be publicly revealed, it could cause Google competitive harm by giving competitors insight into  
22 consumer spending and confidential Google costs figures.

23 1199. **Page 294, Paragraph 467, Note 981 (between "provides an estimate" and "percent**  
24 **average payment"; between "fee to Google, and" and "percent average payment"; between**  
25 **"Spotify and the associated" and "break-even revenue"; between "developer revenue share**  
26 **from" and "We have previously said").** This text contains confidential, non-public information  
27 relating to Google's costs of processing transactions. This information is non-public. The disclosure of  
28



1 this information would cause significant competitive harm to Google Play. For example, if revealed,  
 2 app store competitors to Google Play could use this information to inform their own strategies relating  
 3 to the form of payment options offered to users, potentially impacting user perception of Google Play's  
 4 competitive offerings.

5 **1200. Page 295-96, Paragraph 470 (between “has declined from 30% in 2015” and “in**  
 6 **the first seven months”).** This information reflects internal, confidential data to Google regarding the  
 7 percentage of developers receiving a certain service fee from Google. If publicly revealed, this  
 8 information could influence the competitive decision-making and business strategies employed by  
 9 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 10 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.  
 11 In addition, revealing the number of U.S. developers receiving this service fee rate could influence the  
 12 negotiating strategies and tactics employed by app developers and other current and prospective  
 13 counterparties with which Google does or may transact business.

14 **1201. Page 296, Exhibit 67 (entire graph between x and y axis).** This information reflects  
 15 internal, confidential data to Google regarding the percentage of developers receiving a certain service  
 16 fee from Google. If publicly revealed, this information could influence the competitive decision-  
 17 making and business strategies employed by Google’s app store competitors, for example by  
 18 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 19 themselves from Google Play in the eyes of U.S. developers. In addition, revealing the number of U.S.  
 20 developers receiving this service fee rate could influence the negotiating strategies and tactics  
 21 employed by app developers and other current and prospective counterparties with which Google does  
 22 or may transact business.

23 **1202. Page 297, Paragraph 471, Note 989 (between “around 2020-2021 listing” and end**  
 24 **of sentence; between “brought up in the slide... Q” and “correct? ... THE WITNESS:”; between**  
 25 **“THE WITNESS: I see that” and “are highlighted here”; between “Q You understand that by “**  
 26 **and “correct?. THE WITNESS:”; between “presenter was saying that” and end of sentence;**  
 27 **between “Product Management at Google, stating that” and end of sentence; between “Google**  
 28

document stating that if a” and end of sentence). This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1203. **Page 303, Paragraph 483 (between “Japan have reached” and “of developer revenue”).** This text describes non-public, hypothetical financial figures relating to a non-party’s market share, which is based on non-public competitively sensitive financial data. If publicly revealed, this information could affect Google's negotiating position with future partners, affect Google customer perception regarding perceived value, or lead to conjecture about Google's future financials based on Dr. Rysman’s hypothetical model that is not based in fact.

1204. **Page 307, Exhibit 70 (entire graph between x and y axis).** This text contains the actual quantity and the purported but-for quantity in Plaintiffs' but-for world based on Google's confidential financial data. The disclosure of this information would potentially cause serious harm to Google's competitive position by indicating Google Play's actual quantity and but-for quantity. For example, this information could influence Google's app store competitors in terms of how they market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1205. **Page 317, Paragraph 508, Note 1047 (between start of sentence to “Deposition, pp. 23-24”; between “Google told” and “that the fee”; between “going to charge” and “for these”; between “transactions was” and “depending on the”).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use

1 this non-party information to unfairly target Google's developer partners and offer specific deal terms  
2 designed to undercut those offered by Google.

3       **1206. Page 317, Paragraph 508, Note 1051 (between start of sentence and “Deposition p.**  
4 **93”; between “from using” and “own method”; between “app cost” and “right?”; between**  
5 **“When we say” and “the analysis is”).** The disclosure of a non-party app developer’s highly  
6 confidential information would significantly harm the developer’s business. For example, app  
7 competitors could leverage this information to reap an unearned competitive advantage. They could  
8 exploit this information—that they otherwise would not have access to—to inform their own business  
9 strategies. To prevent these competitive harms from coming to fruition, this non-party proactively  
10 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
11 individuals on an as-needed basis.

12       **1207. Page 319, Paragraph 512 (between start of the sentence and “Tinder, and**  
13 **Bandcamp are a few”).** This text contains confidential, non-public information regarding non-party  
14 developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
15 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
16 will maintain the confidentiality of contractual terms and its own confidential statements made during  
17 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
18 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
19 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
20 Google’s competitors could use this non-party information to unfairly target Google’s developer  
21 partners.

22       **1208. Page 319, Paragraph 512, Note 1061 (between “noting that” and “had been one”).**  
23 This text contains confidential, non-public information regarding non-party developers, and implicates  
24 the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements  
25 made during negotiations. Further, disclosure of this non-public information is likely to result in  
26 competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a  
27 competitor or potential business partner unfair leverage in competing against or negotiating with  
28

1 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
2 Google's developer partners.

3       1209. **Page 319, Paragraph 513 (between "In 2013" and end of the sentence).** This text  
4 contains confidential, non-public information regarding non-party developers, and implicates the non-  
5 parties' confidentiality interests by purporting to reveal the nonparties' confidential statements made  
6 during negotiations. Further, disclosure of this non-public information is likely to result in competitive  
7 harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
8 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
9 Google's competitors could use this non-party information to unfairly target Google's developer  
10 partners.

11       1210. **Page 319-20, Paragraph 513 (between "Google offered" and "as low as"; between**  
12 **"as low as" and "and"; between "and" and "counteroffer was"; between "counteroffer was" and**  
13 **end of sentence."** This text contains confidential, non-public information regarding Google's  
14 agreements and negotiations with non-party developers. Disclosure of this non-public information is  
15 likely to result in competitive harm to Google, as it reveals strategic decision-making which, for  
16 example, could give a competitor or potential business partner unfair leverage in competing against or  
17 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
18 unfairly target Google's developer partners and offer specific deal terms designed to undercut those  
19 offered by Google.

20       1211. **Page 320, Para. 513 (between "Google offered Spotify a" and "in exchange for**  
21 **Spotify"; between "in exchange for Spotify" and end of sentence).** This text contains confidential,  
22 non-public information regarding Google's agreements and negotiations with non-party developers.  
23 Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals  
24 strategic decision-making which, for example, could give a competitor or potential business partner  
25 unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors  
26 could use this non-party information to unfairly target Google's developer partners and offer specific  
27 deal terms designed to undercut those offered by Google.

1212. **Page 320, Paragraph 514 (between “on Google Play. For” and end of sentence; between “with billing options in” and end of sentence; between “billing solution has a” and “and offers”; between “and offers” and end of sentence).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1213. **Page 320, Paragraph 514, Note 1065 (between start of the sentence and “Deposition, pp. 26-27”; between “to 2022, had” and “ever used”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1214. **Page 320, Paragraph 514, Note 1066 (between start of sentence and “Deposition, pp. 51-52”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1215. **Page 320, Paragraph 514, Note 1067 (between start of sentence and “Deposition, pp. 83-84).** This text contains confidential, non-public information regarding non-party developers,

1 and implicates the non-parties' confidentiality interests by purporting to reveal the nonparties'  
2 confidential statements made during negotiations. Further, disclosure of this non-public information is  
3 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
4 example, could give a competitor or potential business partner unfair leverage in competing against or  
5 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
6 unfairly target Google's developer partners.

7       **1216. Page 320, Paragraph 515 (between beginning of paragraph and "preferred its own**  
8 **payment "; between "notes that in July," and end of sentence; between "further notes that" and**  
9 **"needs to justify the"; between "share versus their" and "of payment processing"; between "**  
10 **payment processing costs ..." and "is] not sure it's"; between "at par [with" and "own payment**  
11 **processing").** This text contains confidential, non-public information regarding non-party developers,  
12 and implicates the non-parties' confidentiality interests by purporting to reveal the nonparties'  
13 confidential statements made during negotiations. Further, disclosure of this non-public information is  
14 likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for  
15 example, could give a competitor or potential business partner unfair leverage in competing against or  
16 negotiating with Google. Moreover, Google's competitors could use this non-party information to  
17 unfairly target Google's developer partners.

18       **1217. Page 320, Paragraph 515, Note 1068 (between "Google," and "Code Yellow**  
19 **Proposal,").** This text contains confidential, non-public information regarding non-party developers,  
20 and implicates the non-party's confidentiality interests, by revealing the identity of Google business  
21 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
22 maintain the confidentiality of contractual terms and its own confidential statements made during  
23 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
24 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
25 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
26 Google's competitors could use this non-party information to unfairly target Google's developer  
27 partners.

1218. **Page 320, Paragraph 515, Note 1069 (between “Google,” and “Code Yellow Proposal,”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1219. **Page 321, Paragraph 515 (between “Google described” and “status as “[a]ligned”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s developer partners.

1220. **Page 321, Paragraph 516 (between “possibility to offer” and “commission to Tinder.”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1221. **Page 327, Paragraph 528 (between “Google’s commission to” and “for developers of”).** This information contains non-public information regarding Google’s confidential non-public



1 internal strategic considerations related to creating value for and attracting developers to the Google  
2 Play Store. This information has never been disclosed publicly. Disclosure of this information would  
3 adversely impact Google's current competitive position by enabling Google's competitors to mimic its  
4 confidential strategies in an effort to attract developers away from Google.

5 **1222. Page 327-28, Paragraph 529 (between "create the LRAP++, as" and "was**  
6 **"insufficient for"; between "Thus, the LRAP++ would create an" and "revenue share tier";**  
7 **between "developers participate in and that" and "has participated in the program").** This text  
8 contains confidential, non-public information regarding Google's agreements with non-party  
9 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
10 as it reveals strategic decision-making which, for example, could give a competitor or potential  
11 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
12 competitors could use this non-party information to unfairly target Google's developer partners and  
13 offer specific deal terms designed to undercut those offered by Google.

14 **1223. Page 328, Paragraph 530 (between "The AVP provides" and "in exchange for";**  
15 **between "developers reads as" and "where"; between "where" and end of sentence).** This text  
16 contains confidential, non-public information regarding Google's agreements with non-party  
17 developers. Disclosure of this non-public information is likely to result in competitive harm to Google,  
18 as it reveals strategic decision-making which, for example, could give a competitor or potential  
19 business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
20 competitors could use this non-party information to unfairly target Google's developer partners and  
21 offer specific deal terms designed to undercut those offered by Google.

22 **1224. Page 328, Paragraph 531 (between "GVP participants as" and "where "Play re-**  
23 **invests").** This text contains confidential, non-public information regarding Google's agreements with  
24 non-party developers. Disclosure of this non-public information is likely to result in competitive harm  
25 to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
26 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,

1 Google's competitors could use this non-party information to unfairly target Google's developer  
2 partners and offer specific deal terms designed to undercut those offered by Google.

3 1225. **Page 328, Paragraph 531, Note 1106 (between GOOG-PLAY-000000807-815, at**  
4 **808" and "annually in"; between "annually in" and "years"; between "years" and "cumulative";**  
5 **between "cumulative" and end of sentence).** This information reveals Google's internal non-public  
6 profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the  
7 company and their disclosure is likely to cause Google competitive harm and give its competitors an  
8 unfair advantage. Google's competitors could improperly utilize this internal, non-public data to  
9 modify or augment their business operations in an effort to compete unfairly against Google.  
10 Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Google's  
11 competitors improper insight into the financial health and future outlook of the Play business, which  
12 also arguably gives Google's competitors an unfair advantage.

13 1226. **Page 328-29, Paragraph 531 (between "Tinder," and "and"; between "and" and**  
14 **"among others"; between "by offering a" and "to "mitigate impact").** This text contains  
15 confidential, non-public information regarding non-party developers, and implicates the non-party's  
16 confidentiality interests, by revealing the identity of Google business partners who are not party to this  
17 litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
18 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
19 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
20 decision-making, which, for example, could give a competitor or potential business partner unfair  
21 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
22 this non-party information to unfairly target Google's developer partners.

23 1227. **Page 329, Paragraph 532 (between "Google offered Spotify as low as" and end of**  
24 **sentence; between beginning of sentence and "counteroffer was a maximum of"; between**  
25 **"counteroffer was a maximum of" and "signaling that "they could"; between "consumers to**  
26 **purchase" and "subscriptions from sources"; between "Google offered" and "a lower**  
27 **commission"; between "Spotify building and maintaining" and end of sentence; between "User**  
28

**Choice Billing pilot with” and “as its initial account.”** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1228. **Page 329, Paragraph 532, n. 1109 (between “Google” and “- Next Steps”).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1229. **Page 330-31, Paragraph 537 (between “(though as low as” and “(iii) Google identified 4 programs”).** This text contains confidential, non-public information regarding Google’s agreements and negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1230. **Page 333-334, Paragraph 544 (between “Furthermore, developers, including” and “and Tinder have voiced”; between beginning of sentence and “and Match have voiced”).** This text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who has a reasonable expectation that Google will maintain the

1 confidentiality of contractual terms and its own confidential statements made during negotiations.  
2 Further, disclosure of this non-public information is likely to result in competitive harm to Google, as  
3 it reveals strategic decision-making, which, for example, could give a competitor or potential business  
4 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
5 competitors could use this non-party information to unfairly target Google's developer partners.

6 **1231. Page 334, Paragraph 546 (between "various developers (including" and "and**  
7 **Tinder)").** This text contains confidential, non-public information regarding non-party developers, and  
8 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
9 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
10 maintain the confidentiality of contractual terms and its own confidential statements made during  
11 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
12 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
13 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
14 Google's competitors could use this non-party information to unfairly target Google's developer  
15 partners.

16 **1232. Page 335, Paragraph 549 (between "Section VIII.B.1, Google offered" and "a**  
17 **lower commission"; between "commission in exchange for" and "building and maintaining";**  
18 **between "building and maintaining" and end of sentence; between "additional features**  
19 **including" and end of sentence).** This text contains confidential, non-public information regarding  
20 Google's agreements and negotiations with non-party developers. Disclosure of this non-public  
21 information is likely to result in competitive harm to Google, as it reveals strategic decision-making  
22 which, for example, could give a competitor or potential business partner unfair leverage in competing  
23 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
24 information to unfairly target Google's developer partners and offer specific deal terms designed to  
25 undercut those offered by Google.

26 **1233. Page 349, Exhibit 71 (between "Elasticity" and end of row).** This text reflects  
27 elasticity figures calculated or derived from Google's financial data which is non-public information,  
28

1 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
2 Google. For example, if competitor platforms became aware of this information they could use it to  
3 inform their own strategies, unfairly leveraging Google's financial data to compete more effectively  
4 with Google Play.

5 1234. **Page 351, Exhibit 72 (between “Elasticity” and end of row).** This text reflects  
6 elasticity figures calculated or derived from Google's financial data which is non-public information,  
7 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
8 Google. For example, if competitor platforms became aware of this information they could use it to  
9 inform their own strategies, unfairly leveraging Google's financial data to compete more effectively  
10 with Google Play.

11 1235. **Page 351-52, Exhibit 73 (between “Elasticity” and end of row).** This text reflects  
12 elasticity figures calculated or derived from Google's financial data which is non-public information,  
13 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
14 Google. For example, if competitor platforms became aware of this information they could use it to  
15 inform their own strategies, unfairly leveraging Google's financial data to compete more effectively  
16 with Google Play.

17 1236. **Page 352, Para. 583 (between “is higher than” and end of sentence; between “One**  
18 **exception is the” and “sensitivity”; between “elasticity of about” and end of sentence; between**  
19 **“significant at the” and “level”; between “significant at the” and “level.”).** This text reflects  
20 elasticity figures calculated or derived from Google's financial data which is non-public information,  
21 and if revealed to competitors and potential business counterparties, could be used to disadvantage  
22 Google. For example, if competitor platforms became aware of this information they could use it to  
23 inform their own strategies, unfairly leveraging Google's financial data to compete more effectively  
24 with Google Play.

25 1237. **Page 357, Exhibit 74 (all data in row after “Directs Effects on Price”; all data in**  
26 **row after “Variety Effects”; all data in row after “Total Damages”).** This information reflects and  
27 is calculated from internal, non-public Google financial data. Were this information to be publicly  
28

revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1238. **Page 358, Exhibit 75 (all data in row after “Directs Effects on Price”; all data in row after “Variety Effects”; all data in row after “Total Damages”).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1239. **Page 358, Paragraph 597 (between “are approximately” and “to”; between “to” and “for the period August 16, 2016”; between “and roughly” and “to”; between “to” and “for the period August 16, 2016”; between “versions are approximately” and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and “for the period August 16, 2016”; between “for commission is about” and “percentage points”; between “to consumers is about” and “percentage points”).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1240. **Page 358-59, Paragraph 598 (between “are approximately” and “to”; between “to” and “for the period August 16, 2016”; between “May 31, 2022 and” and “to”; between “to” and “for the period August 16, 2016”; between “versions are approximately” and “for the period August 16, 2016”; between “and roughly” and “for the period August 16, 2016”).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1241. **Page 359, Paragraph 599 (between “versions are approximately” and “to”; between “to” and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and “to”; between “to” and “for the period August 16, 2016”; between “versions are approximately” and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and “for the period August 16, 2016”).** This information reflects and is calculated from internal, non-public Google

1 financial data. Were this information to be publicly revealed, it could cause Google competitive harm  
2 by giving competitors insight into confidential Google financial information.

3 1242. Page 359, Paragraph 602 (between between “are approximately” and “to”;  
4 between “to” and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and  
5 “to”; between “to” and “for the period August 16, 2016”; between “versions are approximately”  
6 and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and “for the period  
7 August 16, 2016”). This information reflects and is calculated from internal, non-public Google  
8 financial data. Were this information to be publicly revealed, it could cause Google competitive harm  
9 by giving competitors insight into confidential Google financial information.

10 1243. Page 359-60, Paragraph 603 (between “are approximately” and “to”; between “to”  
11 and “for the period August 16, 2016”; between “May 31, 2022 and” and “to”; between “to” and  
12 “for the period August 16, 2016”; between “versions are approximately” and “for the period  
13 August 16, 2016”; between “May 31, 2022 and roughly” and “for the period August 16, 2016”).  
14 This information reflects and is calculated from internal, non-public Google financial data. Were this  
15 information to be publicly revealed, it could cause Google competitive harm by giving competitors  
16 insight into confidential Google financial information.

17 1244. Page 360, Para. 604 (between Between “versions are approximately” and “to”;  
18 between “to” and “for the period August 16, 2016”; between “May 31, 2022 and roughly” and  
19 “to”; between “to” and “for the period August 16, 2016”; between “versions are approximately”  
20 and for the period August 16, 2016” between “May 31, 2022 and roughly” and “for the period  
21 August 16, 2016”). This information reflects and is calculated from internal, non-public Google  
22 financial data. Were this information to be publicly revealed, it could cause Google competitive harm  
23 by giving competitors insight into confidential Google financial information.

24 1245. Page 360, Exhibit 76 (all data in row after “Directs Effects on Price”; all data in  
25 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
26 is calculated from internal, non-public Google financial data. Were this information to be publicly  
27  
28



1 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
2 Google financial information.

3 1246. Page 360, Exhibit 77 (all data in row after “Directs Effects on Price”; all data in  
4 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
5 is calculated from internal, non-public Google financial data. Were this information to be publicly  
6 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
7 Google financial information.

8 1247. Page 362, Exhibit 78 (all data in row after “Directs Effects on Price”; all data in  
9 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
10 is calculated from internal, non-public Google financial data. Were this information to be publicly  
11 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
12 Google financial information.

13 1248. Page 362, Exhibit 79 (all data in row after “Directs Effects on Price”; all data in  
14 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
15 is calculated from internal, non-public Google financial data. Were this information to be publicly  
16 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
17 Google financial information.

18 1249. Page 363, Exhibit 80 (all data in row after “Directs Effects on Price”; all data in  
19 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
20 is calculated from internal, non-public Google financial data. Were this information to be publicly  
21 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
22 Google financial information.

23 1250. Page 363, Exhibit 81 (all data in row after “Directs Effects on Price”; all data in  
24 row after “Variety Effects”; all data in row after “Total Damages”). This information reflects and  
25 is calculated from internal, non-public Google financial data. Were this information to be publicly  
26 revealed, it could cause Google competitive harm by giving competitors insight into confidential  
27 Google financial information.

1251. **Page 364, Para. 611 (between “of roughly” and “for the period August 16, 2016”; between “find to be approximately” and end of sentence).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1252. **Page D-1 to D-82, Appendix D (Page D-4, last five columns of row beginning with “Oct. 1, 2019 (ret.) - Sept. 31, 2020 (et seq.) (2.1)”;** Pages D-17 to D-18, last five columns of rows beginning with “Nov. 15, 2019 - May 31, 2020” through “March 1, 2021 - May 31, 2021”; Pages D-21 to D-22, last five columns of rows beginning with “July 1, 2017 - June 30, 2019” through “Through Dec. 31, 2020 (renewing)”;

Page D-25, last five columns of rows beginning with “Oct. 1, 2018-Sept. 30, 2018” and “Oct. 1, 2020-Sept. 30, 2022”; Pages D-27 to D-29, last five columns of rows beginning with “March 1, 2020-Dec. 31, 2020” through “Sept. 1, 2020”; Page D-36, last five columns of rows beginning with “Through Dec. 31, 2020”; Page D-40, last five columns of rows beginning with “July 1, 2019-June 30, 2020”; Page D-43 to D-44, last five columns of rows beginning with “Nov. 1, 2019 - Nov. 1, 2020”; Page D-45, last five columns of rows beginning with “Dec. 16, 2019 - Dec. 31, 2020”; Pages D-79 to D-82, last five columns of all rows). This text contains confidential, non-public information regarding Google’s recent agreements with non-party OEMs. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors could use this non-party information to unfairly target Google’s OEM partners and offer specific deal terms designed to undercut those offered by Google.

1253. **Page E-1 to E-3, Appendix E (all text in columns under “Eligibility” and “Terms” for the first twelve rows; all text in the first, second, and fifth columns of the “Individual Offers” table on Page E-2).** This text contains confidential, non-public information regarding Google’s agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a

competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.

1254. **Page I-1 to I-24, Appendix I (all data in columns after "State" and "Year" and "Total" in Exhibit I.1 table; all data in columns after "State" and "Year" and "Total" in Exhibit I.2 table; all data in columns after "State" and "Year" and "Total" in Exhibit I.3 table).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

1255. **Page J-1 to J-35, Appendix J (all data in columns after "State" and "Year" and "Total" in Exhibit J.1 table; all data in columns after "State" and "Year" and "Total" in Exhibit J.2 table; all data in columns after "State" and "Year" and "Total" in Exhibit J.3 table).** This information reflects and is calculated from internal, non-public Google financial data. Were this information to be publicly revealed, it could cause Google competitive harm by giving competitors insight into confidential Google financial information.

**Google's Motion to Exclude Opinions Offered by Marc Rysman -Exhibit 4 [Dkt. No. 484-5]  
(Exhibit H2)**

1256. **Page 16, Paragraph 31 (between "model is about" and "over the"; between "basis is about" and "in 2020").** This information contains non-public and confidential data regarding app pricing decisions and consumer spending on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1257. **Page 19, Paragraph 35 (between "more than" and "and the hypothetical").** This information contains non-public and confidential data regarding spending and pricing decisions on

1 Google Play. This information has never been disclosed publicly and the Google Play product team  
2 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
3 decision-making and business strategies employed by Google's app store competitors, for example by  
4 influencing how those app stores market themselves to U.S. developers and how they distinguish  
5 themselves from Google Play in the eyes of U.S. developers.

6 1258. **Page 19, Paragraph 36 (between "suggests that" and "is the largest"; between**  
7 **"making up" and "of direct"; between "presumably" and "are only").** This information reveals  
8 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
9 otherwise publicly reported by the company and their disclosure is likely to cause Google competitive  
10 harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
11 internal, non-public data to modify or augment their business operations in an effort to compete  
12 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple  
13 years) gives Google's competitors improper insight into the financial health and future outlook of the  
14 Play business, which also arguably gives Google's competitors an unfair advantage.

15 1259. **Page 19, Paragraph 36, Note 75 (between "calculation excludes" and "including";**  
16 **between "cost gives" and end of sentence; between "chargeback as" and "of a dollar"; between**  
17 **"shown is" and "which is"; between "which is" and "of a dollar"; between "it appears" and**  
18 **"may not").** This information reveals Google's internal non-public profit, revenue, and financial  
19 calculations. These data sets are not otherwise publicly reported by the company and their disclosure is  
20 likely to cause Google competitive harm and give its competitors an unfair advantage. Google's  
21 competitors could improperly utilize this internal, non-public data to modify or augment their business  
22 operations in an effort to compete unfairly against Google. Moreover, visibility into the trends in the  
23 data (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
24 health and future outlook of the Play business, which also arguably gives Google's competitors an  
25 unfair advantage.

26 1260. **Page 20, Paragraph 37, Note 77 (between "more than" and "Her prediction";**  
27 **between "of a" and "price is").** This information reflects and is calculated from internal, non-public

Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

1261. **Page 21, Paragraph 38 (between “by over” and “to about”; between “to about” and “from the”; between “10% is” and “Dr. Tucker’s”; between “by about” and “to”; between “to” and “from August”; between “spend of” and “over August”; between “2022 is” and “of the actual”; between “this is” and “of spend on”; between “decrease by” and “which on an”; between “basis is” and “of spend on”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1262. **Page 23, Paragraph 42 (between “transaction as” and “and using”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

1263. **Page 24, Paragraph 42 (between “is about” and “This would mean”; between “expect an” and “in the quantity”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by

1 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
2 away from Google.

3 1264. Page 24, Paragraph 42, Note 87 (between "cost to be" and "by using"; between  
4 "store is" and "(see Google,"); between "payments" was" and "in the U.S.,"; between "cost of"  
5 and "using the same"). This information contains non-public information regarding Google's  
6 confidential non-public internal strategic considerations related to creating value for and attracting  
7 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
8 this information would adversely impact Google's current competitive position by enabling Google's  
9 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

10 1265. Page 36, Paragraph 65 (between "found that" and "Taken together"; between  
11 "may be" and "less likely"). This information contains non-public and confidential data regarding  
12 user device behavior and purchasing behavior on Google Play. This information has never been  
13 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
14 revealed, this information could influence the competitive decision-making and business strategies  
15 employed by Google's app store competitors, for example by influencing how those app stores market  
16 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
17 U.S. developers..

18 1266. Page 36, Paragraph 67 (between "Android had" and "OS adherence"; between  
19 "2016, and" and "OS"). This information contains non-public and confidential data regarding  
20 research and data on user behavior on Google Play. This information has never been disclosed publicly  
21 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
22 could influence the competitive decision-making and business strategies employed by Google's app  
23 store competitors, for example by influencing how those app stores market themselves to U.S.  
24 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

25 1267. Page 37, Paragraph 67 (between "from about" and "to about"; between "to about"  
26 and "In Table 8,"; between "currently" and "or more"; between "iOS was" and "But this").  
27 This information contains non-public and confidential data regarding research and data on user  
28

1 behavior on Google Play. This information has never been disclosed publicly and the Google Play  
2 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
3 competitive decision-making and business strategies employed by Google's app store competitors, for  
4 example by influencing how those app stores market themselves to U.S. developers and how they  
5 distinguish themselves from Google Play in the eyes of U.S. developers.

6 1268. **Page 50, Paragraph 92 (between "program to" and "Google identified"; between**  
7 **"participants a" and "Google also").** This information contains non-public information regarding  
8 Google's confidential non-public internal strategic considerations related to creating value for and  
9 attracting developers to the Google Play Store. This information has never been disclosed publicly.  
10 Disclosure of this information would adversely impact Google's current competitive position by  
11 enabling Google's competitors to mimic its confidential strategies in an effort to attract developers  
12 away from Google.

13 1269. **Page 51, Paragraph 92 (between "took with" and end of sentence).** This text  
14 contains confidential, non-public information regarding non-party developers, and implicates the non-  
15 party's confidentiality interests, by revealing the identity of Google business partners who are not party  
16 to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of  
17 contractual terms and its own confidential statements made during negotiations. Further, disclosure of  
18 this non-public information is likely to result in competitive harm to Google, as it reveals strategic  
19 decision-making, which, for example, could give a competitor or potential business partner unfair  
20 leverage in competing against or negotiating with Google. Moreover, Google's competitors could use  
21 this non-party information to unfairly target Google's developer partners.

22 1270. **Page 51, Paragraph 93 (between "consumption-only model" and "found that doing**  
23 **so"; between "result in a" and "estimated that Android signups"; between "signups would be"**  
24 **and "if it went consumption"; between "consumption only" and "estimates that going"; between**  
25 **"result in a" and "in Android users"; between "in Android users." and "suggested that";**  
26 **between "As of now, expected" and "given current"; between "optimized flow" and "These**  
27 **estimated losses").** This text contains confidential, non-public information regarding non-party  
28



1 developers, and implicates the non-party's confidentiality interests, by revealing the identity of Google  
2 business partners who are not party to this litigation, and who has a reasonable expectation that Google  
3 will maintain the confidentiality of contractual terms and its own confidential statements made during  
4 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
5 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
6 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
7 Google's competitors could use this non-party information to unfairly target Google's developer  
8 partners.

9       **1271. Page 51, Paragraph 93, Note 192 (between start of sentence and "Google Play**  
10 **Billing"; between "March 2021," and "-GOOGLE-00001105"; between "anticipate a" and end of**  
11 **sentence).** This text contains confidential, non-public information regarding non-party developers, and  
12 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
13 partners who are not party to this litigation, and who has a reasonable expectation that Google will  
14 maintain the confidentiality of contractual terms and its own confidential statements made during  
15 negotiations. Further, disclosure of this non-public information is likely to result in competitive harm  
16 to Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
17 potential business partner unfair leverage in competing against or negotiating with Google. Moreover,  
18 Google's competitors could use this non-party information to unfairly target Google's developer  
19 partners.

20       **1272. Page 57, Paragraph 103 (between "proposition (just" and "from January").** This  
21 information contains non-public and confidential data regarding Android app downloads via web  
22 access on Google Play. This information has never been disclosed publicly and the Google Play  
23 product team treats it as strictly confidential. If publicly revealed, this information could influence the  
24 competitive decision-making and business strategies employed by Google's app store competitors, for  
25 example by influencing how those app stores market themselves to U.S. developers and how they  
26 distinguish themselves from Google Play in the eyes of U.S. developers.

1           1273. **Page 62, Paragraph 110 (between “for between” and “and”; between “and” and**  
2 **“of spend on”).** This information contains non-public information regarding Google’s confidential  
3 non-public internal strategic considerations related to creating value for and attracting developers to  
4 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
5 information would adversely impact Google’s current competitive position by enabling Google’s  
6 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

7           1274. **Page 64, Paragraph 114 (between “of apps,” and “of new apps”).** This information  
8 contains non-public and confidential data regarding developer app monetization on Google Play. This  
9 information has never been disclosed publicly and the Google Play product team treats it as strictly  
10 confidential. If publicly revealed, this information could influence the competitive decision-making  
11 and business strategies employed by Google’s app store competitors, for example by influencing how  
12 those app stores market themselves to U.S. developers and how they distinguish themselves from  
13 Google Play in the eyes of U.S. developers.

14           1275. **Page 65, Paragraph 114 (between “About” and “of the apps”; between “make up**  
15 **the” and “are ad supported”).** This information contains non-public and confidential data regarding  
16 developer app monetization on Google Play. This information has never been disclosed publicly and  
17 the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
18 could influence the competitive decision-making and business strategies employed by Google’s app  
19 store competitors, for example by influencing how those app stores market themselves to U.S.  
20 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers

21           1276. **Page 66, Paragraph 119 (between “choose a” and “with around”; between “with**  
22 **around” and “of apps”; between “apps using” and “during the”).** This information contains non-  
23 public and confidential data regarding developer monetization strategies on Google Play. This  
24 information has never been disclosed publicly and the Google Play product team treats it as strictly  
25 confidential. If publicly revealed, this information could influence the competitive decision-making  
26 and business strategies employed by Google’s app store competitors, for example by influencing how  
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1 those app stores market themselves to U.S. developers and how they distinguish themselves from  
2 Google Play in the eyes of U.S. developers.

3 1277. **Page 67, Exhibit 3 (entire chart and notes).** This information contains non-public and  
4 confidential data regarding developer monetization strategies and decisions on Google Play. This  
5 information has never been disclosed publicly and the Google Play product team treats it as strictly  
6 confidential. If publicly revealed, this information could influence the competitive decision-making  
7 and business strategies employed by Google’s app store competitors, for example by influencing how  
8 those app stores market themselves to U.S. developers and how they distinguish themselves from  
9 Google Play in the eyes of U.S. developers.

10 1278. **Page 67, Paragraph 120 (between “the table” and “of apps”; between “strategy**  
11 **and” and “of apps starting”).** This information contains non-public and confidential data regarding  
12 developer monetization strategies on Google Play. This information has never been disclosed publicly  
13 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
14 could influence the competitive decision-making and business strategies employed by Google’s app  
15 store competitors, for example by influencing how those app stores market themselves to U.S.  
16 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

17 1279. **Page 68, Exhibit 4 (entire chart and notes).** This information contains non-public and  
18 confidential data regarding developer monetization strategies on Google Play. This information has  
19 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
20 publicly revealed, this information could influence the competitive decision-making and business  
21 strategies employed by Google’s app store competitors, for example by influencing how those app  
22 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
23 the eyes of U.S. developers.

24 1280. **Page 78, Paragraph 139 (between “updates at” and “and explained”; between**  
25 **“services are” and “Developers might”).** This information contains non-public and confidential data  
26 regarding the services Google provides to developers on Google Play. This information has never been  
27 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
28

1 revealed, this information could influence the competitive decision-making and business strategies  
2 employed by Google's app store competitors, for example by influencing how those app stores market  
3 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
4 U.S. developers.

5       **1281. Page 78, Paragraph 139, Note 330 (between "that Google" and "to provide";**  
6 **between "updates is" and "for purposes of").** This information contains non-public and confidential  
7 data regarding the services Google provides to developers on Google Play. This information has never  
8 been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
9 revealed, this information could influence the competitive decision-making and business strategies  
10 employed by Google's app store competitors, for example by influencing how those app stores market  
11 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
12 U.S. developers.

13       **1282. Page 82, Paragraph 145 (between "was just" and "of app installs").** This  
14 information contains non-public and confidential data regarding sideloading on Google Play. This  
15 information has never been disclosed publicly and the Google Play product team treats it as strictly  
16 confidential. If publicly revealed, this information could influence the competitive decision-making  
17 and business strategies employed by Google's app store competitors, for example by influencing how  
18 those app stores market themselves to U.S. developers and how they distinguish themselves from  
19 Google Play in the eyes of U.S. developers.

20       **1283. Page 87, Exhibit 5 (entire header, chart, and "Notes" section"; Sources 2 and 3).**  
21 This text describes the net service fee rates for Google Play and two other non-party app stores, which  
22 were calculated using the non-parties' and Google's confidential data. This information is non-public  
23 and the Google Play product team treats it as strictly confidential. The non-party app stores also  
24 proactively maintain the confidentiality of its strategic information, only disclosing it to a select group  
25 of individuals on an as-needed basis. If publicly revealed, this information could influence the  
26 competitive decision-making and business strategies employed by Google's app store competitors, for  
27

1 example influencing what app stores charge as service fees and how they distinguish themselves from  
2 Google Play in the eyes of developers.

3 1284. **Page 87-88, Paragraph 153 (between “noted above, the” and “and”; between**  
4 **“and” and the end of the sentence).** This text describes the net service fee rates for Google Play and  
5 two other non-party app stores, which were calculated using the non-parties’ and Google’s confidential  
6 data. This information is non-public and the Google Play product team treats it as strictly confidential.  
7 The non-party app stores also proactively maintain the confidentiality of its strategic information, only  
8 disclosing it to a select group of individuals on an as-needed basis. If publicly revealed, this  
9 information could influence the competitive decision-making and business strategies employed by  
10 Google’s app store competitors, for example influencing what app stores charge as service fees and  
11 how they distinguish themselves from Google Play in the eyes of developers.

12 1285. **Page 93, Exhibit 7 (entire chart).** This information contains non-public information  
13 regarding Google’s confidential non-public internal strategic considerations related to creating value  
14 for and attracting developers to the Google Play Store. This information has never been disclosed  
15 publicly. Disclosure of this information would adversely impact Google’s current competitive position  
16 by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
17 away from Google.

18 1286. **Page 98, Paragraph 171 (between “worth noting” and “(see Section V.G.3)”;**  
19 **between “which include” and “and found both”).** This information reflects and is calculated from  
20 internal, non-public Google financial data. Google spends significant resources compiling and  
21 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
22 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
23 competitors insight into confidential Google financial information. Further, this information reflects  
24 sensitive, highly confidential characterizations by Google’s internal business teams that, if revealed,  
25 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
26 against Google.

1           1287. **Page 99, Paragraph 173 (between “decreases from” and “to”; between “to” and**  
2 **“after accounting for”).** This information reflects and is calculated from internal, non-public Google  
3 financial data. Google spends significant resources compiling and maintaining this valuable data,  
4 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
5 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
6 Google financial information. Further, this information reflects sensitive, highly confidential  
7 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
8 counterparties in negotiations with Google to gain an unfair advantage against Google.

9           1288. **Page 100, Exhibit 9 (entire chart).** This information reveals Google's internal non-  
10 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
11 by the company and their disclosure is likely to cause Google competitive harm and give its  
12 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
13 public data to modify or augment their business operations in an effort to compete unfairly against  
14 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
15 Google's competitors improper insight into the financial health and future outlook of the Play business,  
16 which also arguably gives Google's competitors an unfair advantage.

17           1289. **Page 112, Paragraph 199 (between “Store included” and “A March 2019”;**  
18 **between “states that” and “identifies Google’s various”).** This information contains non-public  
19 information regarding Google’s confidential non-public internal strategic considerations related to  
20 creating value for and attracting developers to the Google Play Store. This information has never been  
21 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
22 competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort  
23 to attract developers away from Google.

24           1290. **Page 114, Paragraph 204, Note 468 (between “provides that” and “GOOG- PLAY-**  
25 **000618885-910, at 895”;** between “requirement that” and “during the time”). This information  
26 contains non-public information regarding Google’s confidential non-public internal strategic  
27 considerations related to creating value for and attracting developers to the Google Play Store. This  
28

1 information has never been disclosed publicly. Disclosure of this information would adversely impact  
2 Google's current competitive position by enabling Google's competitors to mimic its confidential  
3 strategies in an effort to attract developers away from Google.

4 **1291. Page 117, Paragraph 213 (between "containing provisions" and "on its devices";**  
5 **between "2011 was" and "which could include").** This information contains non-public and  
6 confidential data regarding Google's agreements with mobile carriers on Google Play. This  
7 information has never been disclosed publicly and the Google Play product team treats it as strictly  
8 confidential. If publicly revealed, this information could influence the competitive decision-making  
9 and business strategies employed by Google's app store competitors, for example by influencing how  
10 those app stores market themselves to U.S. developers and how they distinguish themselves from  
11 Google Play in the eyes of U.S. developers.

12 **1292. Page 121, Paragraph 222 (between "2019 around" and "of new Android"; between**  
13 **"2019 that" and "of new Android activations").** This information contains non-public and  
14 confidential data regarding Google's agreements with device makers on Google Play. This information  
15 has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
16 publicly revealed, this information could influence the competitive decision-making and business  
17 strategies employed by Google's app store competitors, for example by influencing how those app  
18 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
19 the eyes of U.S. developers.

20 **1293. Page 122, Paragraph 223 (between "that almost" and "out of every"; between "out**  
21 **of every" and "devices sold").** This information contains non-public information regarding Google's  
22 confidential non-public internal strategic considerations related to creating value for and attracting  
23 developers to the Google Play Store. This information has never been disclosed publicly. Disclosure of  
24 this information would adversely impact Google's current competitive position by enabling Google's  
25 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

26 **1294. Page 122, Paragraph 224 (between "Tier is" and "in Great Britain"; between "at**  
27 **least" and "in France"; between "reaching between" and "to"; between "to" and "in these**



1 **countries”; between “globally increasing” and “[month over”; between “attained” and “of**  
 2 **Google’s device”).** This information contains non-public information regarding Google’s confidential  
 3 non-public internal strategic considerations related to creating value for and attracting developers to  
 4 the Google Play Store. This information has never been disclosed publicly. Disclosure of this  
 5 information would adversely impact Google’s current competitive position by enabling Google’s  
 6 competitors to mimic its confidential strategies in an effort to attract developers away from Google.

7 **1295. Page 123, Exhibit 10 (entire chart; between “Google,” and “February 24”).** This  
 8 information contains non-public and confidential data regarding partnerships with mobile device  
 9 manufacturers on Google Play. This information has never been disclosed publicly and the Google  
 10 Play product team treats it as strictly confidential. If publicly revealed, this information could influence  
 11 the competitive decision-making and business strategies employed by Google’s app store competitors,  
 12 for example by influencing how those app stores market themselves to U.S. developers and how they  
 13 distinguish themselves from Google Play in the eyes of U.S. developers.

14 **1296. Page 124, Paragraph 225, Note 516 (between “MADA include” and “They**  
 15 **wanted”; between “They wanted” and “because its”; between “because its” and “and Motorola”;**  
 16 **between “and Motorola” and “See Bernheim”; between “stated that Google” and “and that**  
 17 **Kilburn”; between “have to” and “See Kolotouros”; between “would have to” and “A: That is”;**  
 18 **between “request to” and “See Kolotouros”; between “asked Google to” and “A: I believe”;**  
 19 **between “And Google” and “correct?”).** This information contains non-public and confidential data  
 20 regarding partnerships with mobile device manufacturers on Google Play. This information has never  
 21 been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
 22 revealed, this information could influence the competitive decision-making and business strategies  
 23 employed by Google’s app store competitors, for example by influencing how those app stores market  
 24 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
 25 U.S. developers.

26 **1297. Page 124, Paragraph 226 (between “to only” and “of all active”; between “...and**  
 27 **only” and “of all active”; between “expectation that” and end of line”).** This information contains

1 non-public and confidential data regarding partnerships with mobile device manufacturers on Google  
2 Play. This information has never been disclosed publicly and the Google Play product team treats it as  
3 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
4 making and business strategies employed by Google's app store competitors, for example by  
5 influencing how those app stores market themselves to U.S. developers and how they distinguish  
6 themselves from Google Play in the eyes of U.S. developers.

7 **1298. Page 125, Paragraph 226 (between "generally be between" and end of sentence).**

8 This information contains non-public and confidential data regarding agreements and partnerships with  
9 mobile device manufacturers on Google Play. This information has never been disclosed publicly and  
10 the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
11 could influence the competitive decision-making and business strategies employed by Google's app  
12 store competitors, for example by influencing how those app stores market themselves to U.S.  
13 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

14 **1299. Page 125, Paragraph 227 (between "Gentzkow's" and "figure is not"; between**  
15 **"August 2022," and "of all device activations"; between "China), and" and "in the United").** This  
16 information contains non-public and confidential data regarding Android device activation data on  
17 Google Play. This information has never been disclosed publicly and the Google Play product team  
18 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
19 decision-making and business strategies employed by Google's app store competitors, for example by  
20 influencing how those app stores market themselves to U.S. developers and how they distinguish  
21 themselves from Google Play in the eyes of U.S. developers.

22 **1300. Page 125, Paragraph 228 (between "claim that" and "of all device"; between**  
23 **"China), and" and "in the United").** This information contains non-public and confidential data  
24 regarding Android device activation data on Google Play. This information has never been disclosed  
25 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
26 information could influence the competitive decision-making and business strategies employed by

Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1301. **Page 126, Paragraph 230 (between "to approximately" and "since April"; between "and over" and "excluding Google").** This information contains non-public and confidential data regarding Android device activation data on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1302. **Page 126, Paragraph 230, Note 526 (between "was approximately" and "in August"; between "2022 and" and "excluding Google").** This information contains non-public and confidential data regarding Android device activation data on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1303. **Page 127, Exhibit 11 (entire chart).** This information contains non-public and confidential data regarding Android device activation data on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google's app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

1304. **Page 127, Paragraph 231 (between "which it expects" and "of devices to").** This information contains non-public and confidential data regarding agreements and partnerships with mobile device manufacturers on Google Play. This information has never been disclosed publicly and

1 the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
2 could influence the competitive decision-making and business strategies employed by Google's app  
3 store competitors, for example by influencing how those app stores market themselves to U.S.  
4 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

5 **1305. Page 130, Paragraph 239 (between "has grown to" and "by July").** This information  
6 contains non-public and confidential data regarding third party app stores on Android. This  
7 information has never been disclosed publicly and the Google Play product team treats it as strictly  
8 confidential. If publicly revealed, this information could influence the competitive decision-making  
9 and business strategies employed by Google's app store competitors, for example by influencing how  
10 those app stores market themselves to U.S. developers and how they distinguish themselves from  
11 Google Play in the eyes of U.S. developers.

12 **1306. Page 131, Paragraph 239 ( between "installed on" and "of GMS devices"; between**  
13 **"App Store" and "and LG"; between "Smart World" and "Importantly, this").** This information  
14 contains non-public and confidential data regarding third party app stores on Android. This  
15 information has never been disclosed publicly and the Google Play product team treats it as strictly  
16 confidential. If publicly revealed, this information could influence the competitive decision-making  
17 and business strategies employed by Google's app store competitors, for example by influencing how  
18 those app stores market themselves to U.S. developers and how they distinguish themselves from  
19 Google Play in the eyes of U.S. developers.

20 **1307. Page 131, Paragraph 240 (between "downloads is" and "leaving just"; between**  
21 **"leaving just" and "for all other"; between "Play Store's" and "and"; between "and" and**  
22 **"respectively").** This information contains non-public and confidential data regarding third party app  
23 stores on Android. This information has never been disclosed publicly and the Google Play product  
24 team treats it as strictly confidential. If publicly revealed, this information could influence the  
25 competitive decision-making and business strategies employed by Google's app store competitors, for  
26 example by influencing how those app stores market themselves to U.S. developers and how they  
27 distinguish themselves from Google Play in the eyes of U.S. developers.

1           1308. **Page 132, Paragraph 241 (between “in 2021” and “used the”; between “i.e., only”**  
 2 **and “used a third-party”; between “in 2021” and “of mobile devices”; between “i.e., only” and**  
 3 **“used a third-party”; between “decreased from” and “in 2015 to”; between “in 2015 to” and “in**  
 4 **2021”; between “store decreased from” and “in 2015”; between “2015 to” and “in 2021”).** This  
 5 information contains non-public and confidential data regarding third party app stores on Android.  
 6 This information has never been disclosed publicly and the Google Play product team treats it as  
 7 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 8 making and business strategies employed by Google’s app store competitors, for example by  
 9 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 10 themselves from Google Play in the eyes of U.S. developers.

11           1309. **Page 132, Exhibit 12 (entire chart and notes).** This information contains non-public  
 12 and confidential data regarding third party app stores on Android. This information has never been  
 13 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
 14 revealed, this information could influence the competitive decision-making and business strategies  
 15 employed by Google’s app store competitors, for example by influencing how those app stores market  
 16 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
 17 U.S. developers.

18           1310. **Page 134, Paragraph 243 (between “more than” and “also have at”).** This  
 19 information contains non-public and confidential data regarding third party app stores on Android.  
 20 This information has never been disclosed publicly and the Google Play product team treats it as  
 21 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 22 making and business strategies employed by Google’s app store competitors, for example by  
 23 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 24 themselves from Google Play in the eyes of U.S. developers.

25           1311. **Page 134, Paragraph 244 (between “prominence with” and “share of”).** This  
 26 information contains non-public and confidential data regarding third party app stores on Android.  
 27 This information has never been disclosed publicly and the Google Play product team treats it as  
 28

1 strictly confidential. If publicly revealed, this information could influence the competitive decision-  
 2 making and business strategies employed by Google’s app store competitors, for example by  
 3 influencing how those app stores market themselves to U.S. developers and how they distinguish  
 4 themselves from Google Play in the eyes of U.S. developers.

5 **1312. Page 134, Paragraph 245 (between “June 2022,” and “of “GMS devices”; between**  
 6 **“more than” and “devices that had”).** This information contains non-public and confidential data  
 7 regarding Android user download behavior on Google Play. This information has never been disclosed  
 8 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 9 information could influence the competitive decision-making and business strategies employed by  
 10 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 11 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

12 **1313. Page 135, Paragraph 246 (between “there were” and “such downloads”; between**  
 13 **“close to” and “downloads per”; between “half of these” and “downloads”; between “source.**  
 14 **The” and “downloads from”; between “to the roughly” and “downloads from Google”; between**  
 15 **“downloads for the” and “downloads including auto”; between “downloads for the” and “app**  
 16 **installs”; between “less than” and “out of”; between “out of” and “that is, less”; between “less**  
 17 **than” and “Thus, sideloading”).** This information contains non-public and confidential data  
 18 regarding aggregate downloads and user download behavior on Google Play. This information has  
 19 never been disclosed publicly and the Google Play product team treats it as strictly confidential. If  
 20 publicly revealed, this information could influence the competitive decision-making and business  
 21 strategies employed by Google’s app store competitors, for example by influencing how those app  
 22 stores market themselves to U.S. developers and how they distinguish themselves from Google Play in  
 23 the eyes of U.S. developers.

24 **1314. Page 142, Paragraph 262, Note 587 (between “For example,” and “and”; between**  
 25 **“and” and “are in Google’s”).** This text contains confidential, non-public information regarding  
 26 Google’s agreements with non-party developers. Disclosure of this non-public information is likely to  
 27 result in competitive harm to Google, as it reveals strategic decision-making which, for example, could  
 28

1 give a competitor or potential business partner unfair leverage in competing against or negotiating with  
2 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
3 Google's developer partners and offer specific deal terms designed to undercut those offered by  
4 Google.

5       **1315. Page 142, Paragraph 263 (between “to only about” and “before increasing”;**  
6 **between “rate of” and “is similar to”).** This information reveals Google's internal non-public profit,  
7 revenue, and financial calculations. These data sets are not otherwise publicly reported by the company  
8 and their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
9 advantage. Google's competitors could improperly utilize this internal, non-public data to modify or  
10 augment their business operations in an effort to compete unfairly against Google. Moreover, visibility  
11 into the trends in the data (i.e., figures across multiple years) gives Google's competitors improper  
12 insight into the financial health and future outlook of the Play business, which also arguably gives  
13 Google's competitors an unfair advantage.

14       **1316. Page 143, Exhibit 13 (entire chart).** This information reveals Google's internal non-  
15 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
16 by the company and their disclosure is likely to cause Google competitive harm and give its  
17 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
18 public data to modify or augment their business operations in an effort to compete unfairly against  
19 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
20 Google's competitors improper insight into the financial health and future outlook of the Play business,  
21 which also arguably gives Google's competitors an unfair advantage. This text contains non-public and  
22 confidential information relating to the service fee rate Google would charge in a but-for world  
23 according to Plaintiffs' expert, which is derived from Google's highly confidential transactional data. If  
24 disclosed, this data point could be used by potential counterparties negotiating with Google as a  
25 benchmark, weakening Google's competitive position.

26       **1317. Page 145, Exhibit 14 (entire chart).** This information reveals Google's internal non-  
27 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
28



1 by the company and their disclosure is likely to cause Google competitive harm and give its  
2 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
3 public data to modify or augment their business operations in an effort to compete unfairly against  
4 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
5 Google's competitors improper insight into the financial health and future outlook of the Play business,  
6 which also arguably gives Google's competitors an unfair advantage. This text contains non-public and  
7 confidential information relating to the service fee rate Google would charge in a but-for world  
8 according to Plaintiffs' expert, which is derived from Google's highly confidential transactional data. If  
9 disclosed, this data point could be used by potential counterparties negotiating with Google as a  
10 benchmark, weakening Google's competitive position.

11       **1318. Page 146, Paragraph 269 (between “fees apply” and “contrary to”).** This  
12 information contains non-public information regarding Google’s confidential non-public internal  
13 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
14 This information has never been disclosed publicly. Disclosure of this information would adversely  
15 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
16 confidential strategies in an effort to attract developers away from Google.

17       **1319. Page 147, Exhibit 15 (entire chart).** This information contains non-public information  
18 regarding Google’s confidential non-public internal strategic considerations related to creating value  
19 for and attracting developers to the Google Play Store. This information has never been disclosed  
20 publicly. Disclosure of this information would adversely impact Google’s current competitive position  
21 by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
22 away from Google.

23       **1320. Page 148, Paragraph 271 (between “Exhibit 5 above” and “As Exhibit 5 above**  
24 **illustrates,”; between “declined from” and “while the average”; between “period ranged from”**  
25 **and “and from”; between “and from” and “respectively”).** This text describes the net service fee  
26 rates for Google Play and two other non-party app stores, which were calculated using the non-parties’  
27 and Google's confidential data. This information is non-public and the Google Play product team treats  
28

1 it as strictly confidential. The non-party app stores also proactively maintain the confidentiality of its  
 2 strategic information, only disclosing it to a select group of individuals on an as-needed basis. If  
 3 publicly revealed, this information could influence the competitive decision-making and business  
 4 strategies employed by Google's app store competitors, for example influencing what app stores charge  
 5 as service fees and how they distinguish themselves from Google Play in the eyes of developers.

6 **1321. Page 158, Paragraph 284 (between “at most” and “of total devices”; between**  
 7 **“failing to” and “in 2020”; between “PHAs increasing from” and “in 2017”; between “2017 to”**  
 8 **and “in 2020”).** This information contains non-public and confidential data regarding security and  
 9 potential harmful application detection on Google Play. This information has never been disclosed  
 10 publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
 11 information could influence the competitive decision-making and business strategies employed by  
 12 Google’s app store competitors, for example by influencing how those app stores market themselves to  
 13 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

14 **1322. Page 159, Paragraph 286 (between “country, showing:” and “of worldwide”;**  
 15 **between “location, with” and “in Japan”; between “close to” and “in several countries”; between**  
 16 **“Philippines, and” and “in other countries”).** This information contains non-public and confidential  
 17 data regarding global behavior regarding sideloading on Google Play. This information has never been  
 18 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
 19 revealed, this information could influence the competitive decision-making and business strategies  
 20 employed by Google’s app store competitors, for example by influencing how those app stores market  
 21 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
 22 U.S. developers.

23 **1323. Page 160, Paragraph 290 (between “Store revenue,” and “both worldwide”;**  
 24 **between “increased from” and “to”; between “to” and “worldwide (excluding”;** between “and  
 25 **from” and “to”; between “to” and “in the United”; between “revenue increased” and “from”;**  
 26 **between “from” and “to”; between “to” and “worldwide(excluding”;** between “and from” and  
 27 **“to”; between “to” and “in the United”.** This information contains non-public and confidential data

1 regarding global behavior regarding sideloading on Google Play. This information has never been  
2 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
3 revealed, this information could influence the competitive decision-making and business strategies  
4 employed by Google's app store competitors, for example by influencing how those app stores market  
5 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of  
6 U.S. developers.

7       **1324. Page 161, Paragraph 290 (between "conduct because" and "is inconsistent").** This  
8 information contains non-public information regarding Google's confidential non-public internal  
9 strategic considerations related to creating value for and attracting developers to the Google Play Store.  
10 This information has never been disclosed publicly. Disclosure of this information would adversely  
11 impact Google's current competitive position by enabling Google's competitors to mimic its  
12 confidential strategies in an effort to attract developers away from Google.

13       **1325. Page 161-162, Exhibit 18 (entire chart and notes).** This information reveals Google's  
14 internal non-public profit, revenue, and financial calculations. These data sets are not otherwise  
15 publicly reported by the company and their disclosure is likely to cause Google competitive harm and  
16 give its competitors an unfair advantage. Google's competitors could improperly utilize this internal,  
17 non-public data to modify or augment their business operations in an effort to compete unfairly against  
18 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
19 Google's competitors improper insight into the financial health and future outlook of the Play business,  
20 which also arguably gives Google's competitors an unfair advantage.

21       **1326. Page 162, Exhibit 19 (entire chart and notes).** This information reveals Google's  
22 internal non-public profit, revenue, and financial calculations. These data sets are not otherwise  
23 publicly reported by the company and their disclosure is likely to cause Google competitive harm and  
24 give its competitors an unfair advantage. Google's competitors could improperly utilize this internal,  
25 non-public data to modify or augment their business operations in an effort to compete unfairly against  
26 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
27  
28

1 Google's competitors improper insight into the financial health and future outlook of the Play business,  
2 which also arguably gives Google's competitors an unfair advantage.

3 1327. **Page 163, Paragraph 291 (between “expenses are” and “of Android”; between**  
4 **“Android revenue” and “thereby undermining”).** This information reveals Google's internal non-  
5 public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported  
6 by the company and their disclosure is likely to cause Google competitive harm and give its  
7 competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-  
8 public data to modify or augment their business operations in an effort to compete unfairly against  
9 Google. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives  
10 Google's competitors improper insight into the financial health and future outlook of the Play business,  
11 which also arguably gives Google's competitors an unfair advantage.

12 1328. **Page 163, Exhibit 20 (entire chart).** This information reflects and is calculated from  
13 internal, non-public Google financial data. Google spends significant resources compiling and  
14 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
15 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
16 competitors insight into confidential Google financial information. Further, this information reflects  
17 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
18 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
19 against Google.

20 1329. **Page 164, Exhibit 20 (between “Notes:” and “4. Ads on”; between “Android**  
21 **revenue” and end of sentence).** This information reflects and is calculated from internal, non-public  
22 Google financial data. Google spends significant resources compiling and maintaining this valuable  
23 data, which is non-public, and if revealed to competitors and potential business counterparties, could  
24 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
25 confidential Google financial information. Further, this information reflects sensitive, highly  
26 confidential characterizations by Google's internal business teams that, if revealed, could be referenced  
27 by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

1           1330. **Page 164, Paragraph 292 (between “are also” and “of Google”).** This information  
2 reflects and is calculated from internal, non-public Google financial data. Google spends significant  
3 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
4 competitors and potential business counterparties, could be used to disadvantage and cause Google  
5 competitive harm by giving competitors insight into confidential Google financial information.  
6 Further, this information reflects sensitive, highly confidential characterizations by Google's internal  
7 business teams that, if revealed, could be referenced by potential counterparties in negotiations with  
8 Google to gain an unfair advantage against Google.

9           1331. **Page 165, Exhibit 21 (entire chart).** This information reflects and is calculated from  
10 internal, non-public Google financial data. Google spends significant resources compiling and  
11 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
12 business counterparties, could be used to disadvantage and cause Google competitive harm by giving  
13 competitors insight into confidential Google financial information. Further, this information reflects  
14 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,  
15 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
16 against Google.

17           1332. **Page 173, Paragraph 306 (between “showing that” and “Exhibit 4”; between “at**  
18 **most” and “of apps”).** This information contains non-public and confidential data regarding  
19 developer monetization strategies on Google Play. This information has never been disclosed publicly  
20 and the Google Play product team treats it as strictly confidential. If publicly revealed, this information  
21 could influence the competitive decision-making and business strategies employed by Google’s app  
22 store competitors, for example by influencing how those app stores market themselves to U.S.  
23 developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

24           1333. **Page 185, Paragraph 334 (between “strategy was about” and end of sentence).** This  
25 information contains non-public and confidential data regarding developer monetization strategies on  
26 Google Play. This information has never been disclosed publicly and the Google Play product team  
27 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
28

1 decision-making and business strategies employed by Google's app store competitors, for example by  
2 influencing how those app stores market themselves to U.S. developers and how they distinguish  
3 themselves from Google Play in the eyes of U.S. developers.

4 1334. **Page 189, Paragraph 344 (between "less than" and "in the period").** This  
5 information contains non-public and confidential data regarding developer monetization strategies on  
6 Google Play. This information has never been disclosed publicly and the Google Play product team  
7 treats it as strictly confidential. If publicly revealed, this information could influence the competitive  
8 decision-making and business strategies employed by Google's app store competitors, for example by  
9 influencing how those app stores market themselves to U.S. developers and how they distinguish  
10 themselves from Google Play in the eyes of U.S. developers.

11 1335. **Page 189, Exhibit 23 (all numbers in table after "2018" and "46.73% and**  
12 **"51.93%" and "1.34%").** This information reflects and is calculated from internal, non-public Google  
13 financial data. Google spends significant resources compiling and maintaining this valuable data,  
14 which is non-public, and if revealed to competitors and potential business counterparties, could be used  
15 to disadvantage and cause Google competitive harm by giving competitors insight into confidential  
16 Google financial information. Further, this information reflects sensitive, highly confidential  
17 characterizations by Google's internal business teams that, if revealed, could be referenced by potential  
18 counterparties in negotiations with Google to gain an unfair advantage against Google.

19 1336. **Page 199-200, Paragraph 371 (between "shows that" and "Exhibit 25"; between**  
20 **"shows that" and "In addition,;" between "that entry" and "For example"; between "For**  
21 **example" and "Entry started"; between "shows how" and end of sentence).** This information  
22 contains non-public information regarding Google's confidential non-public internal strategic  
23 considerations related to creating value for and attracting developers to the Google Play Store. This  
24 information has never been disclosed publicly. Disclosure of this information would adversely impact  
25 Google's current competitive position by enabling Google's competitors to mimic its confidential  
26 strategies in an effort to attract developers away from Google.

1           1337. **Page 200, Exhibit 24 (entire chart).** This information contains non-public information  
2 regarding Google’s confidential non-public internal strategic considerations related to creating value  
3 for and attracting developers to the Google Play Store. This information has never been disclosed  
4 publicly. Disclosure of this information would adversely impact Google’s current competitive position  
5 by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers  
6 away from Google.

7           1338. **Page 201, Exhibit 25 (entire chart).** This information contains non-public and  
8 confidential data regarding app sales, downloads, and user behavior data on Google Play. This  
9 information has never been disclosed publicly and the Google Play product team treats it as strictly  
10 confidential. If publicly revealed, this information could influence the competitive decision-making  
11 and business strategies employed by Google’s app store competitors, for example by influencing how  
12 those app stores market themselves to U.S. developers and how they distinguish themselves from  
13 Google Play in the eyes of U.S. developers.

14           1339. **Page 201, Exhibit 26 (entire chart).** This information contains non-public and  
15 confidential data regarding app sales, downloads, and user behavior data on Google Play. This  
16 information has never been disclosed publicly and the Google Play product team treats it as strictly  
17 confidential. If publicly revealed, this information could influence the competitive decision-making  
18 and business strategies employed by Google’s app store competitors, for example by influencing how  
19 those app stores market themselves to U.S. developers and how they distinguish themselves from  
20 Google Play in the eyes of U.S. developers.

21           1340. **Page 216, Paragraph 406 (between “of roughly” and “for the period”; between “be**  
22 **approximately” and end of sentence).** This information reflects and is calculated from internal, non-  
23 public Google financial data. Google spends significant resources compiling and maintaining this  
24 valuable data, which is non-public, and if revealed to competitors and potential business  
25 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
26 competitors insight into confidential Google financial information. Further, this information reflects  
27 sensitive, highly confidential characterizations by Google's internal business teams that, if revealed,



1 could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
2 against Google.

3 **Google's Motion to Exclude Opinions Offered by Marc Rysman -Exhibit 5 [Dkt. No. 484-6]**  
4 **(Exhibit E3)**

5 1341. This Exhibit is duplicative of Exhibit 2 to Google's Motion to Exclude Opinions  
6 Offered by Hal Singer (Dkt. No. 487-3) and Google's sealing positions are reflected in  
7 Paragraphs 601 to 815 above.

8 **Plaintiffs' Opposition to Google's Motion to Exclude Opinions Offered by Marc Rysman -**  
9 **Exhibit I [Dkt. No. 512-10]**  
10 **(Exhibit I1)**

11 1342. Exhibit I, Page 77, Note 173 (between "which has grown from" and "and (ii) the  
12 number of U.S."; between "which has grown from" and "GOOG-PLAY-001047926"). This text  
13 reflects user and developer numbers on Google Play calculated or derived from Google's internal data  
14 which is non-public information, and if revealed to competitors and potential business counterparties,  
15 could be used to disadvantage Google. For example, if competitor platforms became aware of this  
16 information they could use it to inform their own strategies, improperly leveraging Google's user and  
17 developer data in an effort to compete unfairly against Google Play.

1  
2 I declare under penalty of perjury that the foregoing is true and correct. Executed on the 12th day of  
3 July, 2023, in Manacor, Spain.

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DocuSigned by:  
*Christian Cramer*  
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Christian Cramer